

October 21, 2022

Luly Massaro
Clerk, Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Stakeholder Feedback on PUC Docket 22-01-NG

Dear Public Utilities Commission Staff,

I'm Peter Trafton, of Providence RI. I write as an individual concerned citizen, not representing any organization.

Thank you for the opportunity to submit comments in response to the Draft Staff Recommendation for Public Comment in Docket No. 22-01-NG, *Investigation into the Future of the Regulated Gas Distribution Business in Rhode Island in Light of the Act on Climate* .

I'm truly grateful for your work in preparing this docket and helping Rhode Island understand and prepare for a just transition from fossil fuels to renewable carbon-free energy.

Thank you for considering my responses to the four questions asked in your document. Please let me know if you have any questions.

Response to Questions in the Draft Staff Recommendation for Public Comment

1. Have staff identified appropriate purposes for the docket?

It seems that a significant amount of the work described in this document could be streamlined by beginning with a clear understanding (definition) of what Act on Climate requires from utilities that distribute natural gas: **They must stop doing so completely by 2050**. There is work to be done about replacing the needed energy, managing rate, timing, and geographic locations of the steps involved. The processes should protect the ratepayers and citizens of our state, while respecting the rights and concerns of the utility and its owners. We must protect those who are vulnerable. Costs should be shared equitably, protecting those who are overburdened and overserved. Gas distribution workers' jobs will be eliminated. They must be protected appropriately. Companies that provide and service appliances that burn natural gas, and any other affected folks should similarly be considered. Reliability of service must be maintained. But in the end, this docket must reflect an understanding that the burning of natural gas in RI must end, and on time.

There is mention (top of p.2) of "creation of quinquennial Net Zero Plans beginning in 2025". I fear this suggests that planning will begin then. As of January 2023, there are only 27 years until 2050. It would be foolhardy for us to wait several more years before beginning to decommission natural gas. Many newly purchased gas appliances will not have reached the end of their usable life by 2050. We must ensure that they are not purchased, and that gas-free alternatives are brought swiftly, but responsibly and

equitably, into use as soon as possible. If the utility continues “business as usual”, they will plow resources into infrastructure that will be useless after the gas distribution system is decommissioned.

I believe that a significant area of concern has not been covered adequately. Rhode Island’s Act on Climate (Rhode Island general law §42-6.2, and specifically in §42-6.2-8) states that each agency has the authority to make rules and regulations necessary to meet the greenhouse gas emission reduction mandate of the bill. This would reasonably include the PUC. Since elimination of all greenhouse gases (GHG) related to energy used in the state of Rhode Island is the bill’s goal, it would further seem that the PUC should move in the direction of eliminating the burning of so-called “natural” gas (methane, essentially), or any other GHG-producing substance, without “back-sliding” in the form of expanding gas related infrastructure, increasing use of gas by expanding the number of customers or sites where natural gas is used, or by not beginning immediately to limit natural gas installation in new construction or renovations.

Further, the docket must consider the costs to ratepayers, and the state generally, of inaction, delayed action, and/or missed opportunities to begin the transition from natural gas to renewable energy – almost definitely through the use of electricity generated from renewable energy, which should be (100%) available by 2033.

The docket should explore identification and removal of any current regulations, zoning or business codes, and statutes that unnecessarily prolong the continuing use of natural gas. While 2050 is the goal for ending all GHG emissions, the possibility, and pros & cons of a faster pace should certainly be considered.

2. Is the proposed workplan described in Section III—including a Policy Analysis, Scoping of the Technical Analysis to Be Performed by RIE, and Policy Development—appropriate for meeting the purposes?

This section seems to wander into areas that are beyond the work at hand. If the definitions of the docket’s purposes are adequately defined, some of the proposed workplan elements can surely be eliminated.

In section 2. b), the “point of view” examples do not appear to include greenhouse gas emissions produced by the distribution utility. It should be clear that their own emissions must be included, certainly the carbon-equivalent of methane leaking from Rhode Island’s many ancient distribution pipes, and all other emissions related to the work of running a gas distribution company.

In section 2. e), please be informed that there are interim reductions of greenhouse gas emission totals called for by the Act on Climate, and these must be respected by gas reductions, the distribution of emission sources will need to be clarified by the EC4.

Since Narragansett Electric is a single company that distributes electricity and all its natural gas in a smaller portion of the same area of Rhode Island, the utility would merely switch the form of energy being delivered to its customers, with increasing amounts of electricity replacing the

discontinued natural gas. This should remove any disincentive of loss-of- business from natural gas elimination. The PUC will need to work out a fair sharing of expenses and profits from revisions to the distribution systems and sales of energy during the transition.

3. Do any issues or questions described in Section III need to be narrowed or broadened?

The public health impacts of using natural gas for space heating, water heating, hot water, and cooking or wide-ranging and only now becoming better defined. The injurious effects of burning natural gas are related to products it produces and to associated impurities of the delivered product. While these effects take place almost entirely after natural gas is delivered, and perhaps beyond the PUC's typical sphere of concern, they are a real threat to the health of Rhode Islanders, particularly children. Those who live in small spaces – lower-cost apartments and poorly ventilated dwellings - are most at risk. Asthma and other cardiorespiratory diseases are typical problems. Toxic contaminants are also more common than generally appreciated (see Lebel ED, et al Composition, Emissions, and Air Quality Impacts of Hazardous Air Pollutants in Unburned Natural Gas from Residential Stoves in California

<https://doi.org/10.1021/acs.est.2c02581>

Your review of these topics would be strengthened by consultation with RI Department of Health experts.

Once improved definitions have been established and put to use, I believe that you will be able to eliminate unnecessary issues or questions and add those that become evident.

In section C, 3.c) it seems that “tracking the effects of decarbonization” is quite outside the purview of the PUC. The goal of course is to reduce the GHG content of the earth's atmosphere and reverse the so-far inexorable processes of global warming. There are many confounding variables, Rhode Island's contribution is very small, and the beneficial effects of our climate mitigation efforts may be small themselves and long delayed. However, if one goes beyond the benefits of decarbonization and looks instead at the benefits of discontinuing distribution of natural gas, public health benefits, public safety benefits, cost reductions and expenses associated with all energy distribution being done through electricity, etc. will be clear and calculable. I would suggest that you separate all of these from the effects of “decarbonization”, and rephrase the question.

4. Do any issues or questions need to be eliminated from or added to Section III?

I would urge you to redefine the goals of this process as those required for responsible decommissioning of Rhode Island's Gas distribution. Then, this document can be revised, and this question resubmitted for public comment.

I greatly appreciate the work that has gone into preparing this docket for public comment. The project which it concerns – making an equitable transition from a fossil fuel-based economy to an as yet unachieved purely renewable energy state and economy – is immense and poses many challenges. I'm sure that your efforts will help it become a reality.

Thank you very much for the opportunity to review and comment upon this document.

Sincerely,

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