

From: [Justin Boyan](#)
To: [PublicComments, PUC](#)
Subject: [EXTERNAL] : ATTN: 22-01-NG Future of Gas
Date: Monday, October 3, 2022 8:06:17 AM

Dear Regulators,

I'm writing on behalf of the membership of Climate Action Rhode Island, the statewide affiliate of [350.org](#) [[350.org](#)]. We seek a rapid and just transition from fossil fuels to clean energy in order to preserve a stable climate system.

Rhode Island's decrepit gas network leaks methane into our homes, poisoning us; into our streets, killing our urban canopy; and into the atmosphere, accelerating climate breakdown. The methane that doesn't leak is burned, releasing yet more carbon. The PUC must aggressively phase out the gas network, as required by the Act On Climate, starting immediately. The solution should respect the following principles:

1. All new gas pipeline infrastructure and all new gas hookups must be banned. When you're in a hole, stop digging! No new home or business requires fossil fuel power anymore, with efficient electric ranges, water heaters, and heat pumps available and cost-competitive (especially considering the total cost of ownership and the availability of generous federal rebates). Moreover, the up-front costs of all these appliances are decreasing as mass production increases and technology improves.
2. Substituting hydrogen for methane in our distribution network is a bad idea. According to a recent review of 32 independent studies [<https://www.sciencedirect.com/science/article/pii/S2542435122004160?dgcid=author> [[sciencedirect.com](#)]], "not one suggests a major role of hydrogen for heating."
3. District geothermal "GeoGrids" [<https://heet.org/geogrid/> [[heet.org](#)]] are a promising approach that maintains a role for the utility in managing shared heating (and cooling) infrastructure. It should be aggressively piloted.
4. For residents without access to district heating, air source heat pumps must be the system of choice every time a system is upgraded. In addition to the forced-air systems widely available today, air-to-water systems for homes with hydronic heating are coming onto the market [<https://www.pmmag.com/articles/103778-hydronic-heat-pumps-ride-the-tide-of-electrification> [[pmmag.com](#)]]. Workforce training, simple financing, subsidies and technology support are needed to execute this transition and prevent people from locking in decades more gas dependence when they replace their furnace.
5. The utility must monitor gas usage and carbon footprint across the state at the level of individual buildings and **be directly incentivized to minimize it** via performance-based regulation [<https://www.utilitydive.com/news/upheaval-in-utility-regulation-emerging-nationally-as-hawaii-proves-a-perfo/625529/> [[utilitydive.com](#)]] on the necessary schedule.
6. Financing and pilot programs must especially target assistance to Rhode Islanders in poor, marginalized, and environmentally overburdened communities — those who are

already disproportionately suffering from the health impacts and rate hikes of fossil fuel use and those who are least able to afford the equipment needed to be free of it.

Thank you for your work on this critical task.

Justin Boyan
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