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Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888

ATTN: 22-01-NG Future of Gas

The Northern RI Chamber of Commerce wishes to offer the following comments on "IN RE: INVESTIGATION INTO THE FUTURE OF THE REGULATED GAS DISTRIBUTION BUSINESS IN RHODE ISLAND IN LIGHT OF THE ACT ON CLIMATE" DOCKET NO. 22-01-NG.

- 1. Page 1: The Scoping discussion cites the "economy-wide reductions targets" contained in RIGL 42-6.2 that are "net zero by 2050." The Chamber believes is it important to recite the interim reduction requirements since they are more immediate, and just as enforceable under the law. We believe the first sentence of paragraph two under "Scoping discussion" should read: First, the Act updated the greenhouse gas (GHG) emissions reductions requirements and timeline so that economy-wide reductions targets are accelerated and progress to forty-five percent (45%) below 1990 levels by 2030; eighty percent (80%) below 1990 levels by 2040, and to net zero by 2050."
- 2. Page 3: The scoping document in the second paragraph of page three, states the PUC should "examine other policy factors such as reliability, safety, rate impacts, fairness, equity, and inclusion, among others." The Chamber agrees these considerations are crucial to the planning process. In addition, the Chamber suggests adding "emergency preparedness requirements" to the sentence. We discuss this further in item #5.
- 3. Page 4: Question 2 (a) asks, "What is the definition and effect of "net zero" emissions?" The Chamber requests that the same question be asked of "45% below 1990 levels" and "80% below 1990 levels." While the definition may be more simply answered, the effect may not. It is important that the PUC focus not only on analyses of alternatives to meet the "net zero" mandate, but the 2030 and 2040 mandates as well.
- 4. Page 5: Question 3 (c) asks "From which points-of-view do we wish to track the effects of decarbonization?" It then goes on to name a few possible answers to that question. The Chamber realizes that the term "utility ratepayers" or "gas system ratepayers" could include residential, commercial and industrial ratepayers. In prior state technical

analyses of costs associated with GHG emission alternatives, business have been left behind. The Northern RI Chamber of Commerce asked other state agencies to perform cost analyses for businesses - and offered to assist - but no such analysis was every completed. By adding the phrase "commercial and industrial ratepayers," the Chamber is hopeful that the PUC will be reminded to conduct such technical analyses when the appropriate time presents itself.

- 5. Page 6: Question 3 addresses the processes in place for the procurement of natural gas. The Chamber requests the addition of the following question: "How is gas procurement and distribution impacted by natural emergencies." It is important to understand how natural gas is currently procured and utilized in different emergency situations. It will be as important to understand how various alternative energy sources might change the current emergency response systems in place.
- 6. Page 8: Question 13(b) Asks "What are the quantifiable weaknesses and strengths, such as cost and effectiveness?" The Chamber believes it is important to add reliability to that question. The current energy experiences of other states should strengthen the state's resolve to ask questions concerning alternatives that provide reliable sources of energy.

Thank you for the opportunity to submit comments concerning this important issue. Both Liz Catucci, President and CEO, and I welcome the opportunity to participate as the process moves forward.

Respectfully,

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