



September 14, 2022

Dear Public Utilities Commission,

I am writing on behalf of the Rhode Island Lumber and Building Materials Dealers Association (RILBMDA). The RILBMDA represents independent lumber and building material (LBM) suppliers and associated businesses in the state. RILBMDA is represented by the Northeastern Retail Lumber Association (NRLA), a regional LBM organization with over 1,100 members. Upon reviewing the proposed Public Utilities Commission staff recommendations regarding the Act on Climate Docket No. 22-01-NG, we have some questions and concerns that should be addressed.

The term “gas system” that you use is very vague but seems to be all encompassing. You should more clearly define this term to ensure the proper scope of the purpose of the docket. Are you only talking about gas for cars or are you including gas for heating homes? If the latter, does it mean only oil/propane, or will the state also require transitions away from natural gas? Again, if the latter, forcing a move to electricity for home heating and cooling will drastically drive-up costs for families and businesses given the current high cost of electricity, [currently the 4th highest in the nation](#). The PUC needs to address how these increased costs will be curbed and address the increased demand on the electrical grid with the push towards using more electricity.

It is great you are considering factors like effectiveness, sustainability, reliability, safety, rate impacts, fairness, equity, inclusion, and economic impacts as you explore regulating gas distribution considering the Act on Climate. However, section III does not seem to have many questions related to this. RILBMDA would like to suggest a few ways in which the PUC could address these numerous factors.

- The PUC should consider how transitions to renewable energy across multiple sectors—home heating and cooling, electric cars, etc.—will impact overall costs to businesses and thus costs of goods to consumers in the state. Transitioning to renewable energy is a worthwhile goal, but if it harms those least able to afford it, that makes it poor public policy. We need to ensure transitions such as these do not harm Rhode Island residents and businesses in unanticipated ways.
- There are large upfront costs to transitioning to renewable energy. The PUC needs to consider how families and businesses can afford these costs, in particular, families in lower socioeconomic situations and small, family-run businesses who do not have the capital to make such large, expensive purchases. The upfront high costs associated with transitioning to renewable energy for homes or purchasing electric vehicles (EVs) are a barrier to entry that needs to be considered and addressed.

- The PUC should consider how to increase the availability of solar energy to individuals and businesses to encourage this transition to electricity. If solar panels and other forms of renewable energy production are more easily accessible, then we can create more renewable energy and ease the transition away from gas for heating homes and businesses. This can help reduce the burden on families and businesses during the transition. The PUC should also address how energy companies will need to transition their creation of electricity to more sustainable sources, which can also impact the overall cost of electricity.
- The PUC should also address how this transition will affect jobs of Rhode Islanders and how to retrain those displaced from work by the move away from the use of gas in society for jobs created in this new sector. Along those lines, the PUC should also address how to recycle or reuse the gas sector infrastructure.

There was no discussion in section III about EVs. How are EVs included in this equation? What requirements will there be on businesses to transition to EVs? How will those costs be bore by especially small businesses who cannot afford the upfront high costs of such EVs, nor the added time to pay workers during long recharging periods for medium and large trucks?

Finally, you propose to include involvement from stakeholders in this process. However, there is no discussion of how to identify stakeholders. This should be included so that there is a clear process to identify and reach out to stakeholders for their involvement in this process. RILBMDA would like to be included as an active member in the stakeholder process to execute the scope of this docket.

If you have questions about our comments, please to not hesitate to reach out to myself or our lobbyist, Terrance Martiesian at terrance.martiesian@verizon.net or 401-793-0486.

Thank you for your time. RILBMDA looks forward to continued conversations on, and involvement with, this regulatory process as our state moves towards a more renewable future.

Sincerely,



Katherine Slye-Hernandez, PhD
Director of Legislative & Regulatory Affairs
Northeastern Retail Lumber Association
kslye-hernandez@nrla.org