

PRE-FILED SURREBUTTAL TESTIMONY

OF

LARRY CHRETIEN

May 26, 2026

SUMMARY

Larry Chretien is the Executive Director of the Green Energy Consumers Alliance, an organization that seeks to empower consumers and communities to achieve a just transition to a zero-carbon world through green energy education, programming, and climate advocacy. His surrebuttal testimony responds to arguments advanced in the rebuttal testimony of David Moreira and Michele Leone, both on behalf of Rhode Island Energy. His surrebuttal testimony addresses the consistency of their rebuttal testimony with the obligations of the Act on Climate and the recommendations of the 2025 Climate Action Strategy.

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1 **I. Introduction**

2 **Q. Please state your name and business address.**

3 **A.** Larry Chretien. 188 Valley Street, Providence, RI 02909.

4

5 **Q. Have you previously submitted direct testimony in this proceeding?**

6 **A.** Yes, I submitted pre-filed direct testimony on behalf of Conservation Law Foundation on
7 April 16, 2026, to connect the issues and proposals in the case with Rhode Island’s Act on
8 Climate and the 2025 Climate Action Strategy.

9

10 **Q. What is the purpose of your surrebuttal testimony?**

11 **A.** The purpose of my surrebuttal testimony is to respond to the pre-filed rebuttal testimony
12 of David Moreira (Book 6) and Michelle Leone (Book 4), filed by The Narragansett
13 Electric Company d/b/a Rhode Island Energy (the “Company”) on May 11, 2026.

14

15 **Q. How is your surrebuttal testimony organized?**

16 **A.** Section I of my surrebuttal testimony provides an introduction. Section II discusses my
17 response to Company Witness Moreira’s rebuttal testimony. Section III discusses my
18 response to Company Witness Leone’s rebuttal testimony.

19

20 **II. Response to Company Witness Moreira**

21 **Q. On bates page 10, line 10 of his rebuttal testimony, Witness Moreira writes, “[a]**
22 **climate policy strategy that preserves customer choice for reliable and affordable**

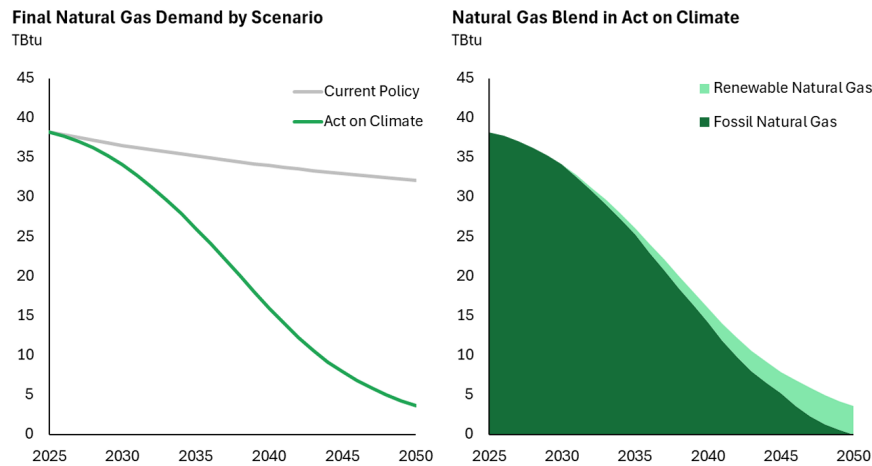
1 **natural gas service along with flexibility for the future is thus compatible with the**
2 **Act on Climate.” Would you agree that continuing to allow customers to install new**
3 **natural gas equipment is compatible with the long-term mandates in the Act on**
4 **Climate?**

5 **A.** It may be inconvenient for Rhode Island Energy, but the simple fact is that compliance
6 with the Act on Climate (“AOC”) is only possible by reducing the greenhouse gas
7 emissions that we produce by burning fossil fuels, including natural gas. The statute is
8 clear on that point and so is the 2025 Rhode Island Climate Action Strategy (“CAS”)
9 produced by the Executive Climate Change Coordinating Council (“EC4”). The CAS is
10 the state’s most recent document outlining its progress on meeting the Act on Climate
11 since its passage, and what policies can be adopted to meet the short and long-term
12 mandates.

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14 **Q.** **What does the Climate Action Strategy say about ongoing use of fossil fuels such as**
15 **natural gas and potential displacement by “renewable natural gas” in Rhode**
16 **Island?**

17 **A.** It is worth referencing what the CAS says about technology and fuels. Figure 24 on page
18 72 states that, “[i]n the Act on Climate scenario, widespread building and industry
19 electrification leads to natural gas throughput (i.e., volume) declining by about 90%
20 between 2025 and 2050, with all remaining gas demand in 2050 being supplied by
21 biogenic renewable natural gas (RNG).”

Figure 24: Natural Gas Throughput and Composition in Act on Climate Scenario



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Figure 1: CAS Natural Gas Graph

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I do not believe that the CAS accurately projected either the available quantity or cost of biogenic renewable natural gas. And as you can see from the figure, RNG would not play a big role in the system for quite some time. But the key point in all of this is the statement that natural gas throughput would fall 90% over the next twenty-five years, or about 4% per year.

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Q. On bates page 13 at line 1, Witness Moreira writes, the Future of Gas Docket’s “Technical Report’s findings demonstrate that continued investment in, and even growth of, the gas system can be compatible with achieving the Act on Climate mandates.” Do you agree that the investment in and growth of the gas system is consistent with the meaning of the Act on Climate and findings in the 2025 Rhode Island Climate Action Strategy?

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A. Unfortunately, the Future of Gas docket’s final report has not yet been released to the public. However, we do know that the 2025 Rhode Island Climate Action Strategy does

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1 not endorse the growth of the gas system. We also know that no states that have
2 completed similar analyses, such as Massachusetts,¹ Vermont,² Colorado,³ and
3 California⁴ have come to the same conclusion drawn by Witness Moreira.

4
5 As a stakeholder in the Future of Gas docket, RI PUC Docket No. 22-01-NG, I can report
6 that the Technical Report referenced by Witness Moreira considered six scenarios: High
7 Electrification, Hybrid Electrification with Delivered Fuels Backup, Hybrid
8 Electrification with Gas Backup, Staged Electrification, Alternative Heat Infrastructure,
9 and Continued Use of Gas. According to the Technical Report, all six scenarios would
10 achieve the requirements of the Act on Climate. And to the main point, the Technical
11 Report states that “gas throughput *declines* (emphasis added) between 45-95% across the
12 six scenarios, primarily as a result of efficiency and electrification. The Continued Use of
13 Gas scenario was modeled to show a *45% reduction* (emphasis added) in gas
14 throughput.”⁵

15
16 **Q. Would the inclusion of renewable fuels be a rationale for why growth of the gas**
17 **system is consistent with the Act on Climate?**

¹ Investigation by the Dep’t of Pub. Utils. on Its Own Motion into the Role of Gas Local Distribution Companies as the Commonwealth Achieves Its Target 2050 Climate Goals, D.P.U. 20-80 (Mass. Dep’t of Pub. Utils.)

² Investigation into the Regulation of Natural Gas in Vermont, Case No. 20-0203-INV (Vt. Pub. Util. Comm’n).

³ Investigation into Gas Planning Options, Proceeding No. 21I-0141EG (Colo. Pub. Utils. Comm’n).

⁴ Order Instituting Rulemaking to Consider Strategies and Examine Alternatives for Decarbonizing California’s Gas System, Rulemaking 20-01-007 (Cal. Pub. Utils. Comm’n).

⁵ The Technical Report was included as Schedule 2 in the Pre-Filed Direct Testimony of Michael Jay Walsh, Ph.D., Technical Report at 6.

1 A. The Future of Gas docket’s Technical report states “in the Continued Use of Gas scenario,
2 a significant share of emissions reductions is attributable to the use of renewable fuels.”⁶
3 Aside from the fact that renewable fuels are not yet proven to be available at a reasonable
4 cost or at the scale called for in the Continued Use of Gas scenario, it is clear that the
5 Technical Report contradicts, rather than supports, Witness Moreira’s contention that
6 increased natural gas use is compatible with the Act on Climate.

7
8 In addition to the Technical Report, the Commission could also refer to the CAS, which
9 states:

10 The buildings sector under the Act on Climate scenario reach a 42% reduction by
11 2030, 77% by 2040, and 100% by 2050. Reductions are primarily driven by
12 widespread adoption of electric heat pumps, with all buildings in Rhode Island
13 having a heat pump installed by 2050. Electric heat pumps provide all heating
14 needs in around two-thirds of homes, while the remaining third use electric heat
15 pumps as their primary heating source but retain their existing furnaces or boilers
16 to provide backup heat during the coldest hours of the year. By 2050, all the gas
17 and fuel oil consumed by these backup heaters is assumed to be met with
18 renewable fuels.⁷

⁶ *Id.* at 45.

⁷ The Climate Action Strategy was included as Schedule 2 in the pre-filed direct testimony of Larry Chretien, CAS at 64.

1 A thorough examination of the CAS section on building decarbonization reveals that
2 several strategies described point to policies that would increase energy efficiency and
3 electrification.⁸ None of them suggest increased natural gas consumption. Witness
4 Moreira might be putting too much weight on the Technical Report’s Figure 29, which
5 shows that the Continued Use of Gas pathway sees an increased number of gas
6 customers, driven primarily by the conversion of customers from oil to gas.⁹ Related to
7 that dubious finding, the Report’s Figure 51 shows a very large amount of uncertainty
8 regarding the cost of renewable fuels, which is one of the key pillars of that pathway.¹⁰
9

10 Regarding the question of renewable fuel supply, the Technical Report relies on a ten-
11 year old Department of Energy study to estimate how much of the nation’s biomethane
12 resource could be allocated to the state of Rhode Island.¹¹ Furthermore, the Technical
13 Report states “[s]cenarios that retain high levels of gas demands, particularly the
14 Continued Use of Gas, may rely on currently non-commercialized fuels as early as 2030
15 resulting from constraints in availability of biomass resources ... While the above results
16 should not be interpreted as prescriptions or forecasts of renewable fuel demand or
17 availability for the state, they do show increased risk of dependence on renewable
18 fuels.”¹² In a discussion of Scenario Implications, the Technical Report states:

⁸ *Id.* at 99.

⁹ Technical Report at 59.

¹⁰ *Id.* at 83.

¹¹ *Id.* at 103.

¹² *Id.* at 105.

1 As noted throughout this report, there is significant uncertainty associated with
2 the availability and cost of renewable fuels, as well as the emissions impact of
3 fuels under different accounting mechanisms. As all scenarios rely on renewable
4 fuels to some extent, at minimum to comply with the Biodiesel Heating Act, there
5 is an increasing need for ways to mitigate uncertainty that can be addressed in the
6 policy development phase of the Docket.¹³

7 The Technical Report also states that “scenarios with high levels of renewable fuels ...
8 face high levels of cost, partially due to the level of commercialization associated with
9 these technologies.”¹⁴ The reliance on so-called renewable fuels in addition to the
10 extended life of the gas system that Rhode Island Energy says is compliance with the Act
11 on Climate will lock Rhode Islanders into paying for costly and volatile fossil fuels well
12 into the next several decades.

13
14 I would argue that one of the best ways to mitigate the great uncertainties and lock-in
15 risks associated with RNG would be to reduce gas throughput overall by reducing the
16 number of customers on the gas system. This is why it is prudent in 2026 to eliminate
17 subsidies to those who would be new gas customers.

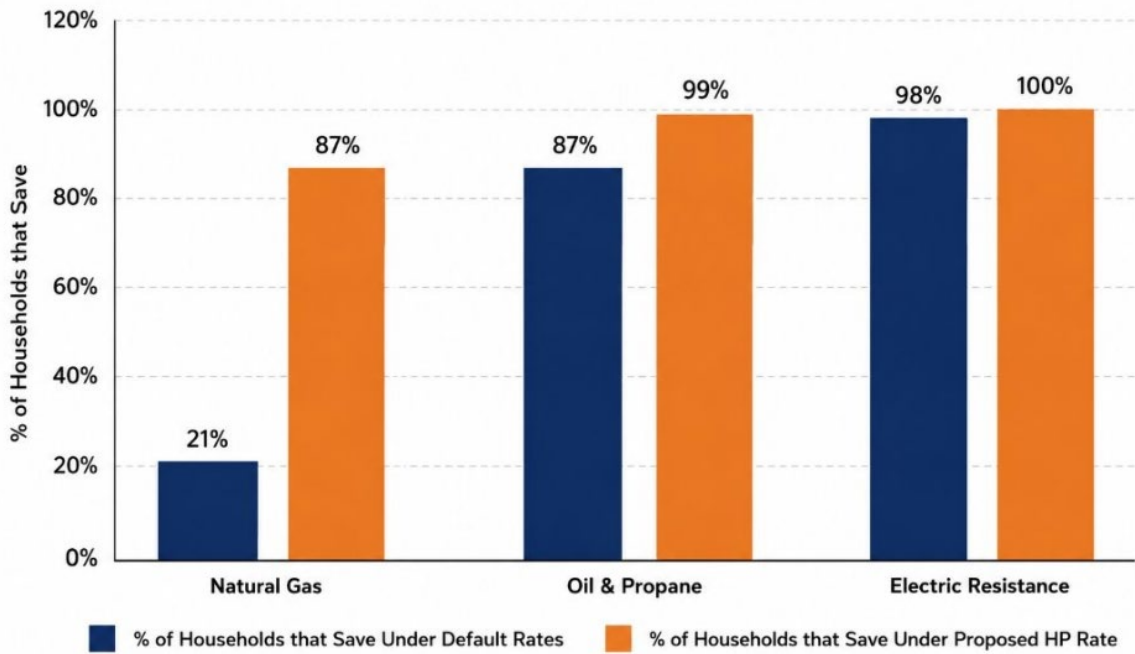
18
19 **Q. Witness Moreira also states, at bates page 16, line 4, that eliminating the line**
20 **extension allowance policy will “not guarantee heat pump adoption, and it could**

¹³ *Id.* at 114.

¹⁴ *Id.* at 10.

1 **even motivate the retention or installation of more oil heating systems, increasing**
2 **emissions.” How do you respond?**

3 **A.** Witness Moreira’s statement is a very gas utility-centric statement. First, I am not saying
4 that eliminating the line extension allowance will guarantee heat pump adoption. It will
5 eliminate a subsidy that has outlived its usefulness. Second, oil heat installations have
6 been declining for several years because consumers wish to avoid the costs and risks
7 associated with an oil tank. Third, if the state of Rhode Island is going to encourage the
8 conversion of any customer to heat pumps, it should start with customers who do not
9 have gas yet. Fourth, and foremost, the cost per Btu of oil and propane are far greater
10 than the cost of operating a heat pump. On the price signals relating to energy costs, the
11 graphic below shows the percentage of households that save when they upgrade to a heat
12 pump, under both current rates and a proposed heat pump rate, broken down by fuel type.
13 As you can see, heat pumps already win out 87% of the time versus oil and propane in
14 Rhode Island.



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Graphic developed by Amanda Barker using data from Switchbox “Heat Pump Rates in Rhode Island” Report.

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For some evidence that heat pumps are preferred in terms of operating costs, I refer you

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to the following cost comparison tools:

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- Efficiency Maine, *Compare Home Heating Costs* (last visited May 26, 2026),

8

<https://www.energymaine.com/at-home/heating-cost-comparison/>.

9

- Mass Save, *Heating Comparison Calculator* (last visited May 26, 2026),

10

<https://www.masssave.com/residential/heating-comparison-calculator>.

11

- Massachusetts Clean Energy Center, *Lower Your Energy Bills Over Time* (last visited May 26, 2026), <https://goclean.masscec.com/homeowners/lower-your-energy-bills-over-time/>.

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- 1 • Massachusetts Department of Energy Resources, *Massachusetts Household*
2 *Heating Costs* (last visited May 26, 2026), [https://www.mass.gov/info-](https://www.mass.gov/info-details/massachusetts-household-heating-costs#household-heating-costs-for-2024-2025-winter-by-average-consumption-for-each-fuel)
3 [details/massachusetts-household-heating-costs#household-heating-costs-for-2024-](https://www.mass.gov/info-details/massachusetts-household-heating-costs#household-heating-costs-for-2024-2025-winter-by-average-consumption-for-each-fuel)
4 [2025-winter-by-average-consumption-for-each-fuel](https://www.mass.gov/info-details/massachusetts-household-heating-costs#household-heating-costs-for-2024-2025-winter-by-average-consumption-for-each-fuel).

5
6 **III. Response to Company Witness Leone**

7 **Q. In her original rebuttal testimony, Witness Leone was asked to describe the**
8 **Company’s holistic approach to energy resources. She responded, at bates page 10,**
9 **lines 6-7, by saying that “‘holistic’ means a technology- and fuel-neutral approach**
10 **that facilitates meeting the requirements of the Act on Climate.” Given your**
11 **experience in energy policy and with the state’s climate plans, do you feel that a**
12 **technology- and fuel-neutral approach is an adequate pathway to meeting the Act on**
13 **Climate?**

14 **A.** On that point I disagree, because there is no way for the state of Rhode Island to achieve
15 the mandates of the Act on Climate without steadily reducing the amount of natural gas
16 consumed by customers of Rhode Island Energy’s gas division and the amount of fossil
17 fuels consumed in the generation of power for the company’s electricity customers. To be
18 specific, gas consumption in Rhode Island must be reduced by a robust combination of
19 weatherization, building code advancements, and electrification. Basic mathematical
20 analysis shows that adding new consumers to the gas network simply makes it harder to
21 achieve the mandates at each milestone. From an economic perspective, when Rhode
22 Island Energy adds a new gas customer, more financial pressure is placed on every other

1 sector of the state’s economy to reduce emissions – whether in buildings, electricity, or
2 transportation. In fact, when Rhode Island Energy adds new gas customers, it adds to the
3 burden of its existing customers because the cost of complying with the Act on Climate
4 will be passed onto ratepayers.

5
6 **Q. Witness Leone, on bates page 11, line 14 through page 9, line 8, provides a list of**
7 **programs and activities to provide gas service to customers and asserts that these**
8 **programs align with the Act on Climate. Do you agree that these programs are**
9 **consistent with the Act on Climate in the short and long-term?**

10 **A.** No, they are not. Witness Leone’s response fails to acknowledge scientific consensus, the
11 CAS, and the Future of Gas Technical Report – all of which draw the obvious conclusion
12 that the AOC requires steadily lower greenhouse gas (“GHG”) emissions over time. That
13 is the plain meaning of the statute. To quote the AOC itself,

14 “the state shall reduce its statewide greenhouse gas emissions to the targets set
15 forth in § 42-6.2-2(a)(2)(i), as those targets may from time to time be revised, and
16 that achieving those targets shall be mandatory under the provisions of this
17 chapter. The targets at the time of the enactment of this act [April 10, 2021] are
18 that greenhouse gas emissions shall be ten percent (10%) below 1990 levels by

1 2020, shall be forty-five percent (45%) below 1990 levels by 2030; eighty percent
2 (80%) below 1990 levels by 2040, and shall be net-zero emissions by 2050.”¹⁵

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4 **Q. Are you recommending that the Commission discontinue these programs because**
5 **they are inconsistent with the Act on Climate?**

6 **A.** No. My statement is that these programs are inconsistent with the AOC in meeting its
7 2030, 2040, and 2050 requirements. At this time, there has not been sufficient progress on
8 reforming and aligning the gas system with the AOC’s requirements to determine the
9 timing and need to phase out the programs that Witness Leone references. What has been
10 demonstrated in this docket is that the line extension policy is both inconsistent with the
11 AOC and inconsistent with the Company’s own justification. We are not asking the
12 Commission to conflate specific evidence regarding a single policy with the broader need
13 to align gas system management with the AOC.

14
15 **Q. On bates page 12, lines 11-12, Witness Leone states that “[t]he Company has an**
16 **obligation to provide safe and reliable gas service to its customers and must view the**
17 **State’s Act on Climate obligations through this lens.” Does this Company lens**
18 **distort the requirements of the AOC?**

¹⁵ R.I. Gen. Laws § 42-6.2-9.

1 A. Yes. This interpretation of the AOC is clearly incorrect. There is nothing in the Act that
2 would exempt any fossil fuel supplier or consumer from regulations that might be
3 promulgated in order to achieve GHG reductions. It is not a matter of safe and reliable
4 gas service or GHG reduction. It is a simple matter of safe and reliable service and GHG
5 reduction. Rhode Island Energy will have to reconcile its business model to the reality
6 created by the statute five years ago.

7

8 **IV. Conclusion**

9 **Q. Does this conclude your testimony?**

10 A. Yes, it does. I reserve the right to amend or supplement this testimony based on the
11 receipt of additional information.

**STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC COMPANY :
d/b/a RHODE ISLAND ENERGY APPLICATION FOR : **DOCKET NO. 25-45-GE**
APPROVAL OF A CHANGE IN ELECTRIC AND GAS :
BASE DISTRIBUTION RATES :

AFFIDAVIT OF LAWRENCE CHRETIEN

Lawrence Chretien does attest and swear to the following:

I, Lawrence Chretien, certify that the attached pre-filed direct testimony and related schedules, submitted on behalf of the Conservation Law Foundation, which bear my name, were prepared by me or under my supervision and control and are true and accurate to the best of my knowledge and belief.

Signed under the pains and penalties of perjury this 26 day of May, 2026.



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