



January 18, 2022

John Spirito, Chief of Legal Division
Luly Massaro, Clerk
RI Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, Rhode Island 02888
re: Docket No. D-21-09
National Grid transfer to PPL

Dear Mr. Spirito:

I write on behalf of the Environment Council of Rhode Island, a coalition of 60 environmental organizations in Rhode Island. Our mission is to serve as an effective voice for developing and advocating policies and laws that protect and enhance Rhode Island's environment.

The Division of Public Utilities and Carriers (DPUC) is charged with approving the proposed transaction subject to a decision that the transaction is *in the public interest*. Our Coalition has serious concerns about the sale of National Grid to PPL, a Pennsylvania corporation. Our concerns are magnified in light of Rhode Island's statutory requirement to act on climate. We urge the DPUC to consider the Act On Climate (RI General Law 42-6.2-9) central to the public interest.

Selling the gas and electric utilities seems likely to result in a loss of Rhode Island's momentum towards its climate goals. While National Grid has a mixed record in the fields of energy efficiency and working to meet emissions reduction goals, PPL has an even worse record. In almost every measure and every energy program, PPL has not had to meet as ambitious carbon reductions requirements.

National Grid's efficiency programs are rated in the top 5 nationally, while none of the areas of the country PPL operates in currently are anywhere near the top. It is certainly possible that PPL could catch up to the experience National Grid has in running clean energy programs—like offshore wind procurement, meeting the Renewable Energy Standard, and statutory ratepayer-funded energy efficiency programs, but it wouldn't be easy. Unless there are very clear statements on how the efficiency programs will be run and enhanced—with no additional cost to ratepayers—we are left with little confidence that the transition will be smooth or benefit Rhode Island ratepayers.

Offshore wind is evolving into a major source of energy in Rhode Island, and will become an even larger percentage of our electricity generation over the next decade. National Grid has been able to develop this expertise, entering into some of the first offshore wind contracts in the nation in both

Massachusetts and Rhode Island. PPL has no experience in offshore wind, and would once again be playing catch up, which is likely to add to the costs for Rhode Island ratepayers. It could also cause us to miss opportunities in the rapidly expanding industry—on top of the opportunities we’ve missed by postponing offshore wind procurement due to the sale in the first place. The “commitments” offered by PPL in December show no real understanding of the issues, nor how they will ramp up their expertise in a timely fashion at low cost. The Division should not approve any sale on the basis of promises from PPL. A decision that this sale is in the public interest must be made based on specific, measureable, and enforceable commitments from the utility company that will actually keep us on track to reducing emissions.

These issues, and others in the same vein give us pause. We would most definitely like to see strong and specific statements of just how PPL will get up to speed on climate issues, energy efficiency, offshore wind procurement and other issues related to the climate emergency that Rhode Island faces before we would come to believe that this sale is in the best interest of Rhode Island and the pocketbooks of Rhode Island ratepayers.

Sincerely,



Priscilla De La Cruz
President, Environment Council of Rhode Island