

January 17, 2022
To RI Division of Public Utilities and Carriers

Re Docket D-21-09

My name is Peter Trafton.
I am a citizen of Providence, Rhode Island.
(address 13 Constitution HL, 02904. Mobile Phone 401.486.8289).

I write to document my concerns, as public comments, about Pittsburgh Power and Light's (PPL) ill-prepared and poorly composed offer for purchasing Narragansett Electric (NE) from the current owner, British-based National Grid.

Quite simply, the requirements for managing Rhode Island's Gas and Electric Utilities have changed radically since the above-named corporations filed their petition for ownership transfer with the DPUC on May 4th, 2021. These changes are not adequately addressed in their application for approval of the sale of NE.

The Act On Climate, which became RI law barely two weeks earlier, requires that Rhode Island promptly begin transitioning to net zero fossil fuel energy, and complete that complex and radical transition by 2050.

The requirements of decarbonizing Rhode Island's energy system will include

1. Complete phase-out and decommissioning of NE's natural gas distribution system, with conversion of natural gas heating, cooking, processing, and other facilities to other energy sources – most likely to electric energy produced by non-fossil fuel technologies).
2. Conversion to such "clean energy" sources will require
 - a. maximal deployment of energy efficiency processes,
 - b. procurement and full integration of wind and solar energy sources sufficient to ensure electric distribution grid stability,
 - c. ensuring sufficient electric power to replace
 - i. all electricity currently produced with fossil fuels,
 - ii. all energy currently produced by burning natural gas, fuel oil, and propane in buildings (HVAC and other uses) and
 - iii. to replace energy used for transportation that is now obtained from gasoline and diesel fuel.
 - d. Design and installation of a completely remodeled "smart grid" to manage decentralized electricity generation and distribution efficiently and effectively for all current and future users.
 - e. As Act On Climate requires, the transition of energy production and use from burning fossil fuels to renewable, clean sources must include environmental and

economic justice principles in all its processes. Aspects of the transition involving NE, its employees, and its customers, must be transparent, just, equitable and thorough. Members of the involved communities must be included in the planning, execution, and monitoring of the processes.

- f. NE's electric and gas energy sales and service are used by practically every Rhode Islander. The transitions required by Act On Climate, essential as part of our response to climate change which is already impacting Rhode Island, will affect all of us. Rhode Islanders will need to be informed and understand the many changes and why they are needed. Narragansett Electric, to maintain the public's trust and support, will need to create and maintain its own public information processes to educate and support the public. These should be closely integrated with involved state agencies to insure appropriate and non-conflicting messaging. For example, National Grid's current website says

"It's clean and green. Natural gas is the cleanest-burning fossil fuel and a highly efficient form of energy. It has fewer impurities and reduces CO2 emissions by 27 percent, so you'll feel good about helping the environment." *This is unacceptable greenwashing!*

PPL has not, as far as I can tell, truly recognized, and accepted that their purchase of NE carries obligations to support and effect the energy transitions mandated by Act On Climate. In a supplemental petition (Dec. 11, 2021) to Docket D-21-09, PPL states that within 12 months of the purchase transaction closing, they will "submit a report on its specific decarbonization goals for Narragansett to support the goals of Rhode Island's 2021 Act on Climate ("Act on Climate") and the long-term strategy for the gas distribution system in light of the Act on Climate. They further state that they will also report on a Grid Modernization Plan in 12 months, and on Distributed Energy Resources Management in 36 months after closing the purchase.

PPL has little experience with highly effective energy efficiency systems, like that which RI and NG have established. They have no experience with offshore wind power generation, integrating renewable energy generally, dealing with a dangerously leaking national gas system, or undertaking a true decarbonization process.

While National Grid has contributed to RI's energy efficiency programs, there are many steps that it has not yet taken to promote decarbonization (steps I have outlined above). Any plans that might be carried over are too rudimentary to help our state.

I urge the DPUC to recognize that the parties involved in the sale of Narragansett Electric have not demonstrated that this sale would protect the public from degradation of service, nor have they established that the sale would be in the public's interest, as it is set forth by the Act On Climate. Please require clear, comprehensive, and timely commitments on all the involved issues so that if this sale does go through, it will neither delay nor hinder Rhode Island's transition to a clean energy economy.

Thank you very much for accepting my comments on this very important issue.

Sincerely,

A handwritten signature in black ink that reads "PG Trafton". The letters are cursive and somewhat slanted to the right.

Peter G. Trafton