November 25, 2020

In RE: National Grid’s Aquidneck Island Long-Term Gas Capacity Study

Dear Mr. Schuster:

Thank you for the opportunity to provide comments on National Grid’s Aquidneck Island Long-Term Gas Capacity Study (“Capacity Study”). While this study references the 2019 gas outage (“2019 Outage”) on Aquidneck Island, it is important to state at the outset of our comments that the Capacity Study does not address the causes of the 2019 Outage. The RI Division of Public Utilities and Carriers (RI DPUC) has made clear that the 2019 Outage resulted directly from a combination of multiple equipment failures and management failures in meeting contractual capacity of individual delivery points. It is our understanding that National Grid and Enbridge have taken a corrective action by clarifying their contractual capacity responsibilities to better manage the capacity flow through each delivery point. Given the actions that were taken to correct identified system vulnerabilities, the confluence of events coming together to cause an outage similar to the 2019 Outage is reduced.

Turning to the Capacity Study – As an island off a coastal state, Aquidneck Island is especially vulnerable to the impacts of climate change. The long-term interests of Aquidneck Island’s communities will be best served by an aggressive transition away from fossil fuels that will allow the state to meet its carbon reduction targets. This would dually protect the residents of Aquidneck Island from the public health and safety risks associated with both climate change impacts as well as gas. Investing in additional gas infrastructure will be a burden to ratepayers statewide while leaving National Grid with stranded assets. Gas has been touted as a bridge fuel, and whether or not one agrees with that sentiment, the reality is that we need to be seeking energy options on the other side of that bridge. Rather than focusing on expanding yesterday’s technology, we need to continue to make progress toward decarbonization by (1) expanding energy efficiency programs & electrification, (2) implementing a demand response system, and (3) exploring opportunities for other green technology innovations such as geothermal micro districts to reduce demand. We favor planning scenarios and implementation that would advance the goals and priorities articulated herein.

National Grid should be working with customers to reduce gas demand in our communities. Gas and associated infrastructure have well-documented safety and health concerns. Combustion and methane leaks will continue to contribute to local safety risks, air pollution, and climate change for decades. Even “decarbonized fuels” like renewable natural gas or hydrogen substitutes carry the same risks to public health and safety as geological natural gas. In sum – the continued use of these fuels compromises the health and safety of residents; expanding the infrastructure for their continued use will be a cost passed on to ratepayers at a time when so many are struggling.
Economic development and growth are not reliant on an expansion of gas infrastructure. Aquidneck Island municipalities can continue their development plans without increasing reliance on gas. New buildings can easily be designed to meet their energy needs with a combination of efficiency measures and modern green technologies. The National Renewable Energy Lab Research Support Facility located in Golden, CO is a 222,000 sq ft all-electric building. The average winter temperatures in Golden, CO are comparable to the average winter temperatures in Portsmouth, RI. Technology innovations enabling buildings to utilize heating sources other than gas are not restricted to new construction either. There are countless examples of renovation projects utilizing geothermal technology while maintaining historic preservation standards; the geothermal installations at The Breakers and the Moran Shipping Agencies Providence headquarters located in the former Rhode Island Medical Society Building are just two of these examples. Weatherization and electrification are far more cost-effective solutions for ratepayers than an expansion of gas infrastructure.

While we strongly favor a reduction in reliance on gas, we understand that the solutions will not happen overnight. Therefore, if there is determined to be a need for LNG storage on Aquidneck Island, we favor utilizing a facility on the Navy base. We believe that locating such a facility on the Navy base will best mitigate any security and safety concerns surrounding an LNG storage facility.

Finally, any LNG storage facility siting should be subject to the Energy Facility Siting Board’s (“EFSB”) oversight. While we supported the initial emergency waiver of the temporary facility at Old Mill Lane, a waiver of the EFSB oversight for a longer-term LNG storage facility is inappropriate. The Energy Facility Siting Act recognizes that energy facilities, while serving an important role in our energy systems, raise very real public health and public safety considerations. The EFSB is the proper regulatory authority to vet National Grid’s proposals to ensure a proper balance between the consumer costs, adverse environmental impacts, health and safety of RI’s citizens, and demonstrated need of the facility to meet the energy needs of the community.

We appreciate your time and consideration of our comments and welcome ongoing dialogue about National Grid’s plans as you move forward.

Sincerely,

[Signatures]

Senator Dawn Euer
Senate District 13

Representative Lauren H. Carson
House District 75

Senator Louis P. DiPalma
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