BY HAND

February 26, 2019

The Honorable Roger A. Picard
Chair, Senate Committee on Commerce
Room 212, State House
Providence, RI 02903

RE: S-0194 Joint Resolution Creating Electric and Gas Transmission Study Commission

Dear Chair Picard,

I write on behalf of the Conservation Law Foundation (CLF), a nonprofit, member-supported environmental organization regarding S-0194, the bill creating a Legislative Study Commission on the state’s electric and gas transmission and distribution system.

CLF commends the sponsors of S-0194 for recognizing that rapidly-changing energy markets pose significant challenges for market participants, regulators, legislators, and the public. CLF is acutely aware of the severe problems caused by the recent gas outages on Aquidneck Island. CLF agrees with the sponsors of the Joint Resolution that dependable energy infrastructure is crucially important to homeowners and businesses.

CLF has decades of experience working on issues pertaining to wholesale, interstate, FERC-regulated gas and electricity markets as well as on issues concerning state-regulated gas and electricity distribution markets. At the transmission level, CLF is an active participant in various committees and working groups of ISO-New England, the operator of New England’s electricity grid. At the distribution level, CLF is a party in a wide range of regulatory proceedings before the R.I. Public Utilities Commission (PUC), including, most recently, in the electricity and gas distribution rate cases before the PUC. As such, CLF has deep knowledge and understanding of energy markets.

In order to ensure that the proposed Legislative Study Commission is able to accomplish its stated purpose of making a comprehensive study and evaluation of state’s gas and electricity transmission and distribution systems, CLF respectfully suggests two changes to the current bill.

First, the bill should explicitly state that the Legislative Study Commission’s inquiry must be done in the context of existing Rhode Island law, including the Resilient Rhode Island Act, R. I. Gen. Laws §42-6.2-1, et seq. The Resilient Rhode Island Act sets carbon emission reduction targets for the state of 10% below 1990 levels by 2020, 45% by 2035, and 80% by 2050.
The energy transmission and distribution systems are changing very rapidly, and perhaps the largest single driver of that change is the recognition of the climate-change emergency. The General Assembly acted on that recognition in 2014 when it enacted the Resilient Rhode Island Act; that recognition should be reflected in this bill. This can be accomplished by adding a sentence to the portion describing the purposes of the bill such as the following: “In performing its comprehensive study the Legislative Study Commission shall consider the changing nature of gas and electricity markets and the carbon reduction provisions of the Resilient Rhode Island Act.”

Second, the bill should provide for two members on the Legislative Study Commission from the broader environmental community, preferably persons with background, knowledge, and experience in gas and electricity markets and in strategies for reducing carbon emissions. Utilities are already well represented on the Commission, and equity and balance suggest that environmentalists must also be represented. CLF would be happy to serve.

Thank you for your consideration,

Sincerely,

Amy E. Moses
Director, CLF Rhode Island

Cc: Members of the Senate Committee on Commerce