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PIPE LINE AWARENESS NETWORK
FOR THE **NORTH EAST, INC.**
www.plan-ne.org

March 1, 2022

VIA ELECTRONIC MAIL ONLY

Poppy Milliken
ERM, on behalf of the Future of Gas
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Re: MA DPU Docket No. 20-80: *Investigation by the Department of Public Utilities on its own Motion into the role of gas local distribution companies as the Commonwealth achieves its target 2050 climate goals*

The Pipe Line Awareness Network for the Northeast, Inc. (“PLAN”) submits the following comments in response to E3 and ScottMadden’s February 15, 2022 draft report¹ (“the Consultants’ Report”), and the accompanying local distribution company (“LDC”) draft reports (the “LDC Reports,” and, together with the Consultants’ Report, the “Draft Reports”), prepared pursuant to the Massachusetts Department of Public Utilities (“DPU” or “Department”) Docket No. 20-80.

The gas utilities should not be allowed to be *de facto* designers of our energy future; “if all you have is a hammer, everything looks like a nail.” The Draft Reports of the 15th are what we would expect if you put the gas industry in charge of deciding the future of the gas industry. This must not be the final result of this investigation. We are alarmed and concerned that the Department may grant the LDCs the veritable Christmas wish list of regulations that their consultants have proposed.

The Commonwealth must act decisively, and must establish natural gas phaseout dates – a deadline after which no new gas customers will be added; a deadline after which no new gas infrastructure is permitted; a deadline by which reductions in gas consumption are imposed, with punitive penalties upon the LDCs (not the consumers) for failure to comply. Hybrid scenarios should be considered only as a transition to full electrification and gas system decommissioning, not as a final outcome.

¹ Energy and Environmental Economics Inc. (E3) *The Role of Gas Distribution Companies in Achieving the Commonwealth’s Climate Goals Independent Consultant Report DRAFT* (2022) (available at [https://thefutureofgas.com/content/downloads/2.15.22%20-%20DRAFT%20Independent%20Consultant%20Technical%20Report%20-%20Part%20I%20\(Decarbonization%20Pathways\).pdf](https://thefutureofgas.com/content/downloads/2.15.22%20-%20DRAFT%20Independent%20Consultant%20Technical%20Report%20-%20Part%20I%20(Decarbonization%20Pathways).pdf)).

We are alarmed, but not surprised, that the LDCs intend to expand infrastructure² on the false promise of future “decarbonized” fuels and false accounting of non-lifecycle emissions.

- Biomethane, rebranded “renewable natural gas” (“RNG”), can only ever account for a limited supply, and is best restricted to use only at the site of production (e.g., landfills, farms), rather than being piped through a leaky pipeline system. As summed up by one energy policy expert, “RNG cannot serve as a replacement for fossil gas — there isn’t enough of it and it’s too expensive — and it shouldn’t be used as an excuse to slow decarbonization. And it shouldn’t be used as an excuse not to decommission gas infrastructure.”³
- “Green hydrogen” is essentially still in the pipedream phase; if and when that limited supply becomes available, it will go first (and likely only) to the hard-to-electrify end uses.
- High carbon-emitting “gray” or “blue” hydrogen is not a meaningful placeholder in a transition to the false solution of piped green hydrogen.
- “Certified”, “Responsibly Sourced”, “Diversified” or otherwise named “better” fossil gas is purported to be sourced through environmentally “responsible” procurement practices, but has no established formal industry-wide definition. We reject the proposal that such “better gas” be delivered to gas ratepayers at a premium for unspecified, yet allegedly “significantly less emissions.”⁴

Regarding hydrogen, the proposed blend of gases in the pipeline system would still be at least 80% methane, and primarily fossil gas, so this would be a very incremental shift away from natural gas. Further, it is likely that blending in hydrogen would require the replacement of appliances and infrastructure – meaning expending more ratepayer dollars for a dubious partial “solution”.

² "Decarbonization of gas network that addresses the procurement of low carbon fuels (e.g., Diversified Gas, RNG, Hydrogen) and investment in its pipeline network to deliver cleaner fuel to natural gas customers", Eversource Proposal Summary (available at https://thefutureofgas.com/content/downloads/Eversource%20DPU%2020-80%20MA%20Proposal%20Summary_FINAL.pdf)

³ Eric de Place, in a Mar. 16, 2021 comment on “The Four Fatal Flaws Of Renewable Natural Gas: Gas utilities are telling tall tales about RNG,” Sightline Institute, Mar. 9, 2021, L. Feinstein & E. de Place (available at <https://www.sightline.org/2021/03/09/the-four-fatal-flaws-of-renewable-natural-gas/>).

⁴ Fitchburg Gas and Electric Light Company d/b/a/ Unitil (“FG&E” or the “Company”) *D.P.U. 20-80 – FG&E Proposal to Support Massachusetts 2050 Climate Goals* (available at [https://thefutureofgas.com/content/downloads/FG&E%20Proposal%20Summary%20DPU%2020-80%202.15.22%20\(Final\).pdf](https://thefutureofgas.com/content/downloads/FG&E%20Proposal%20Summary%20DPU%2020-80%202.15.22%20(Final).pdf)).

Ratepayer money, and the Commonwealth's money, should be invested in actual low- and zero-emissions solutions, not baby steps that ultimately serve no one but energy company shareholders. Specifically, PLAN advocates for:

- Rapidly transitioning away from any type of gas for residential uses and most commercial uses, and ultimately 100% decommissioning of the gas system;
- investment in electrification infrastructure;
- investment in vastly more aggressive energy efficiency and demand-side management;
- and a regulatory framework that supports modern district energy, distributed energy generation, and distributed energy storage.

PLAN does not want the Commonwealth to enable LDCs to shift from a business model of profiting by building out natural gas infrastructure to a business model of profiting by building out infrastructure for piping natural gas blended with other gases. We need a real shift that is founded in the rapid transition away from a combustion-based energy system.

Respectfully submitted,



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