



April 23, 2020

Dear Governor Raimondo,

We appreciate your leadership during this difficult time and your thoughtful consideration of how business and our daily lives must be different as we move through this crisis period.

Thank you and your team for releasing the Heating Sector Transformation in Rhode Island report this week, marking the 50<sup>th</sup> anniversary of Earth Day. Our organizations have participated throughout the stakeholder process—attending meetings, submitting comments, and meeting with Office of Energy Resources staff.

The science of climate change is clear and unequivocal. To prevent the worst effects of climate change and also make the clean energy transition at lowest cost to Rhode Islanders, the state must act quickly and decisively to decarbonize our economy by 2050. As the report notes, the heating sector includes more than a third of Rhode Island's greenhouse gas pollution and achieving the state's greenhouse gas goals will require fully decarbonizing commercial and residential heat.

The study that Brattle Group prepared included a large menu of potential policy options. Notably, it included a few high-impact policies and programs that the state can begin implementing aggressively right now for maximum impact. We describe four of those best options below. It also includes a problematic option for converting non-fossil resources into methane that we recommend against.

- **Science-based, mandatory greenhouse gas emissions reduction requirements:** We need to immediately adopt the 2020 Act on Climate Bill (S2165, H7399) that would amend the Resilient Rhode Island Act to update our emissions targets to be enforceable and in line with the latest science.
- **Aggressive implementation of energy efficiency:** The report highlights that energy efficiency is an essential component of decarbonization strategy. Rhode Island must do all that it can in the annual efficiency planning process to strengthen and expand the scope of our efficiency work as a necessary first step to decarbonization.
- **Rapid expansion of the use of heat pumps:** Greenhouse gas emissions are reduced substantially when using heat pumps compared with heating oil, propane, and fossil ("natural") gas. We applaud the Office of Energy Resources for allocating resources to rescue heat pump incentives for delivered fuels customers. Rhode Island needs to create a long-term, sustainable, and equitable program and expand its reach across the state.
- **100% Renewable Energy Standard:** The report highlights the need to greatly electrify the thermal sector. To do this in a way that best reduces greenhouse gas emissions, we need to adopt a 100% Renewable Energy Standard, a policy that would implement your 100% Clean Electricity Executive Order from January 2020.

These are all effective and proven policies that are well-studied within Rhode Island and across the country. The time for small pilots of these policies has passed: we need to rapidly scale up each of these strategies immediately, while simultaneously continuing to innovate with new policies and technologies. We also note that the report left out any discussion of equity, particularly by focusing narrowly on single-family homes as the primary example. The State must ensure that all Rhode Islanders have access to clean energy.

We caution against the report's inclusion of proposed "Power2Fuels" technologies – converting non-fossil resources into methane (an incredibly potent greenhouse gas) and using that to supplement or replace fossil gas. Our current gas infrastructure is old and leaky. Creating methane out of new sources and injecting it into our current infrastructure would continue to release this potent greenhouse gas into the atmosphere at unacceptable rates. Leakage of methane from our state's gas infrastructure is a massive contributor to overall state emissions, and it is simply not possible to achieve even the state's existing greenhouse gas reduction goals while these leaks continue. The cost to substantially overhaul our infrastructure to prevent leaks has already proven to be cost prohibitive, before accounting for the increased cost of the manufactured fuel itself. Further, the use of methane from any source continues to pose an increased risk to public health and safety.

The climate crisis is one that we have seen coming for many years. We know, from this report and others, what we need to do to mitigate the worst outcomes. What we need now is political leadership and courage from you to enable these policies and programs. A key lesson from your leadership during the current COVID-19 crisis is that our decisions must be grounded in science and data. The science of climate change is clear and unequivocal. To prevent the worst effects of climate change – effects already being felt in Rhode Island – we must decarbonize our economy by 2050, and the state needs to act quickly and decisively to benefit the generations to come. We stand ready to work alongside you and your administration to deliver a cleaner, healthier future for all Rhode Islanders.

Thank you and Happy Earth Day,

Hank Webster, Acadia Center

Jerry Elmer, Conservation Law Foundation

Kai Salem, Green Energy Consumers Alliance

Sue AnderBois, The Nature Conservancy

Cc: Nicholas Ucci, Acting Commissioner, Office of Energy Resources

Linda George, Acting Administrator, Division of Public Utilities and Carriers

Janet Coit, Director, Department of Environmental Management & Chair, EC4

Nicole Verdi, Deputy Chief of Staff, Office of the Governor