

(By Email)

June 19, 2020

Luly E. Massaro, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

Re: Docket No. 5015 – Public Utilities Commission – Review of Least Cost Procurement Standards

Dear Commissioners:

On behalf of Acadia Center, I am pleased to provide a letter of support for the 2020 review of Least Cost Procurement (LCP) Standards in Docket No. 5015. Acadia Center is a non-profit research and advocacy organization committed to advancing the clean energy future and works to build clean, low-carbon, and consumer-friendly economies.

Acadia Center appreciates the opportunity to participate in the review process with stakeholders over the last several months and to provide comment on the Commission's proposed revisions to the LCP standards. Acadia Center cannot overstate the value of using a robust, collaborative process to leverage diverse areas of expertise and incorporate a broad array of priorities into a plan advancing proven climate solutions.

Acadia Center supports many of the proposed changes and offers the following additional recommendations:

- The LCP standards should incorporate more of the proposed language concerning equity that was developed collaboratively by the Office of Energy Resources and other stakeholders. While Acadia Center understands the PUC's desire to avoid prescriptive language, it is imperative these standards guide all parties to address systemic injustice in our energy systems.
- Acadia Center appreciates the expansion of language concerning environmental responsibility. Acadia Center recommends adding a consideration of indoor air pollution as one of the enumerated potential impacts. This is an appropriate consideration as the Company delivers its energy products and services directly into buildings and offers programs and incentives related to the use of their product and services inside those buildings.

While it is important to consider the local and regional outdoor environmental impacts of a proposed energy investment, it is equally important to consider the indoor environmental impacts of that measure. For example, a recent report published by the UCLA Fielding School of Public Health, finds that “gas appliances emit a wide range of air pollutants, such as carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), including nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM) and formaldehyde which have been linked to various acute and chronic health effects, including respiratory illness, cardiovascular disease, and premature death.”<sup>1</sup> Additionally, a report released by Physicians for Social Responsibility, Mothers Out Front, Rocky Mountain Institute, and Sierra Club finds that “homes with gas stoves have approximately 50 percent to over 400 percent higher average NO<sub>2</sub> concentrations than homes with electric stoves” and “the short- and long-term

NO<sub>2</sub> levels in homes with gas stoves are higher than *outdoor* EPA air quality standards.”<sup>ii</sup>

These reports note the health impacts from these pollutants are amplified in smaller, poorly ventilated spaces making this a particularly important environmental justice issue. The PUC should consider adding language to the standards that considers indoor air pollution as an opportunity to address equity in energy systems.

- Finally, Acadia Center urges the PUC to include language that considers energy savings for all fuels, including delivered fuels, and provides a pathway for a program of heating electrification. This is properly within the PUC’s purview as an economic regulator, particularly because one entity holds a monopoly on electric and gas business. Generally, a delivered fuels customer of today is also an electric ratepayer. A delivered fuel customer that seeks to transition away from a delivered fuel heating source has limited choices: heating electrification utilizing their existing electrical service or connecting as a new fossil gas ratepayer.

Recognizing the PUC’s role as an economic regulator requires not just a consideration of the customer bases of today, but also how the Company may seek to add to those customer bases. Including language in the standards that creates a pathway for a heating electrification program for delivered fuels customers will provide Rhode Island customers and ratepayers with more options and perhaps even a level playing field for electrification. Without a sustainable heating electrification incentive, these delivered fuel customers will be encouraged to transition to fossil gas, leading to additional charges for the customer, money for the Company, local and indoor air pollution and additional a failure to meet Rhode Island’s climate goals.

In conclusion, the LCP revisions proposed by the PUC represent a significant step forward, and there is room for additional progress. Acadia Center looks forward to continued collaborations with all stakeholders and the PUC on this and other important climate, energy, and environmental justice issues.

Respectfully,



Hank Webster  
Rhode Island Director & Staff Attorney

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<sup>i</sup> [“Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California.” UCLA Fielding School of Public Health. April 2020, Page 6.](#)

<sup>ii</sup> [“Health Effects from Gas Stove Pollution.” Rocky Mountain Institute, Physicians for Social Responsibility, Mothers Out Front, and Sierra Club. May 2020, Page 11.](#) (emphasis added)