

Memorandum

Date: July 27, 2022

To: DEM Director Terry Gray; Chair, Executive Climate Change Coordinating Council (EC4)
Interim Commissioner Chris Kearns, Office of Energy Resources

From: Hank Webster (*Acadia Center*), Kai Salem & Mal Skowron (*Green Energy Consumers Alliance*),
Sue AnderBois (*The Nature Conservancy*), Meg Curran, (*Conservation Law Foundation*),
Priscilla De La Cruz, (*Audubon Society of Rhode Island*)

Re: Comments on Climate Plan Draft as of June 29, 2022

Dear Director Gray and Interim Commissioner Kearns,

Thank you for the opportunity to provide comments on the current draft chapters of the 2022 Climate Plan. We are very grateful for the ability to provide feedback as sections are developed and appreciate the willingness of the Administration to share these drafts. As noted in our previous memoranda to the EC4 in July 2021, January 2022, and April 2022, our objective is to help the Administration implement the Act on Climate. These and future comments will serve as a continuation of that pledge.

We also appreciate the many ongoing opportunities for stakeholder input and the detailed project-management approach adopted by the EC4. The increased frequency of in-person, hybrid, and remote EC4 activities is critical to gathering as much public input as possible during this critical process. We also appreciate the increased focus on finding near-term, foundational, sector-by-sector actions the state must take to achieve greenhouse gas emissions reductions in line with the 2030 requirements of the Act on Climate. We look forward to hearing more about the Administration's recommended priority actions in upcoming stakeholder engagements.

We also recognize the recent departures of state personnel working directly on the plan development process. We respectfully request an update on the Administration's strategy moving forward so that all stakeholders can be aware of any changes in the previously published schedule and workplan and if we can be of any additional assistance to the Administration. Our group of advocates meets virtually on a biweekly basis and we are pleased to invite you to our next upcoming meeting at **noon on August 9th**. Of course, we would be happy to accommodate you at another time if that is preferable.

Equity and Engagement

We appreciate the Administration's recognition of the need to engage directly with community, environmental, and energy justice organizations as part of this process. We recommend the Administration continue to seek deeper engagement as part of ongoing EC4 activities, as well as identify broader process changes that might lower barriers to participation in regulatory efforts. In addition, we recommend identifying opportunities to brief these groups about the 2022 process at their own regularly scheduled meetings and events. We have previously provided a non-exhaustive list of known community meetings and could identify other opportunities for this engagement if helpful.

Working Draft Comments:

- On Page 12, the draft says “Components of the 2016 Plan that do not need to be updated include the model itself.” Could you please provide greater detail on the meaning of this sentence? Does that mean the modeling will not be corrected? We believe there may be some faulty assumptions in previous modeling such as that landfill emissions will drop to zero when the Johnstown Landfill closes.
- Will the 2022 Plan include other modeling recommendations identified in the Stockholm Environmental Institute/Brown University report “Deeper Decarbonization in the Ocean State”, such as modeling a more accurate leakage rate for methane from the aging gas distribution system?
- We appreciate the point on page 15 that “we will also describe how our inventory might look different if we were to use a 20-year timeframe instead.” We would suggest those numbers be included in full (not just descriptively), even if in a footnote or appendix, but ideally they would be in the main text.
- On Page 16, on the inconsistency in the region over production/generation vs. consumption-based accounting, the text reads “In the absence of consistent methodology, we will need to caveat our greenhouse gas inventory with an additional description of which emissions may not be included.” We believe there should be disclosure, even if only in a footnote or appendix, of estimates of local generation-based emissions. As the state moves towards achieving 100% Renewable Energy Standard, understanding which local generation emits pollutants into frontline communities may help develop further policies aimed at reducing or wholly eliminating that pollution.
- We appreciate the exclusion of LULUCF carbon sinks in the state inventory at this time (p. 16). While the state should properly value, protect, and expand carbon sinks such as forests, the reliability and permanence of resources to offset emissions is highly uncertain and the state’s emissions reduction strategies should not be overly reliant on natural carbon sequestration to meet climate mandates.

Greenhouse Gas Emissions Inventory Process, Methodology, and Tools

- On Page 20, we appreciate inclusion of the recommendation for Rhode Island to coordinate with other states to request the EPA shorten the lag time for relevant data from three years to one year or less.
- On Page 22, we agree with the decision to include methane leakage from the gas distribution system as emissions from the thermal sector. Methane leakage from the gas distribution system is widespread and recent studies also suggest significant leakage from behind the meter: <https://globalenergymonitor.org/wp-content/uploads/2021/01/Gas-Index-report-2020.pdf>. At the same time, we recognize the state will be examining methane leakage and mitigation strategies in the upcoming Future of Gas docket, 22-01-NG initiated by the Public Utilities Commission. In many cases, abandonment and electrification of customer end uses connected to leak-prone sections of pipe would be a preferable long-term emissions reduction strategy compared to the significant expense and continued use of fossil gas. As noted in the state’s Heating Sector Transformation report, widespread use of purported fossil gas replacements such as hydrogen or “renewable” gas is unrealistic as there will be insufficient quantities available and significant increases in costs.
- On Page 22, we would recommend one adjustment to the final paragraph. We appreciate the

decision to focus efforts around the most impactful and immediate priority actions to reduce Rhode Island's emissions. We note that a significant portion of commercial heating, particularly in smaller commercial entities, may be decarbonized utilizing similar strategies from the residential sector, such as central heat pumps and heat pump water heaters.

- On page 25, the report notes that RIAC provides RIDEM with an annual inventory of greenhouse gas pollutants associated with T.F. Green airport. Is it possible to collect this data for all airports operated by RIAC?
- On page 25, the draft chapter discusses the limitations of the SIT and MOVES models. However, it is not clear which model(s) the state proposes to use moving forward. We agree with the recommendation for states to ask the Environmental Protection Agency (EPA) to correctly distinguish electric and non-electric vehicle emissions. Is there an additional strategy the state may pursue in the event EPA is unable or unwilling to make those recommended changes? Could Rhode Island estimate transportation emissions in some other way that is more accurate?
- On page 25, the draft chapter indicates that the 2018 inventory changed from 2013 - 2017 in that it did not use the MOVES model. We suggest adding an explanation and switching back to the MOVES model, supplemented by SIT for non-highway vehicles—or another more accurate modeling approach, if there is a better one.
- The image on page 27 omits a corresponding label for the yellow portion of the bar—please clarify this data point. Based on the similar image on Page 29, the yellow may refer to emissions from landfill gas used to generate electricity.
- On page 27, we support treating the portion of electricity resulting in ACPs as emitting.
- On page 27, we generally support using average emissions from in-state generation to calculate the emissions; however, we ask: is this consistent with practices throughout the region? If not, emissions may be double-counted regionally due to not all states using the ISO-NE emissions average. Further, is this consistent with what RI has done in previous emissions inventories?
- On page 28, in the third paragraph, please consider amending the first sentence to include language such as, “In 2018, Rhode Island had six electricity generators using carbon-based fuels, five of which used natural gas and one of which used landfill gas.
- At the end of the proposed sentence above, please consider including a footnote that explains both “natural” and “landfill” gas are predominantly methane. Additionally, we suggest using the term “fossil” in lieu of “natural” as a general matter where appropriate to best convey the significant carbon emissions related to methane. This may also be a good opportunity to discuss how gas from our landfill is consumed today and limitations for more widespread use.
- Related to the discussion on Page 28, please consider including an infographic that includes the location and capacity of each fuel-based electricity generator. It may also be interesting to readers to understand the location and size of renewable energy generators—at least those above a certain size.
- Footnotes 23 and 24 are foundational enough to the understanding of GHG inventories that they could be included in the main text of this chapter to provide the reader with fuller context.
- Please consider adding a graphic describing the operation or flowchart of RECs. There will be added emphasis on RECs and renewable electricity's role in Rhode Island as a result of the 100% RES legislation.
- Please consider adding language to footnote 25 that we have had a winter-peaking system before. This language could also note that there is headroom or additional capacity in the ISO-NE region to handle a winter-peaking system and that the development of offshore wind is expected to help

offset impacts of heating electrification as it is a resource that typically ramps up production in the colder winter months.

- On page 30, is there a way to recalculate the 1990 baseline given the limitations of the SIT model? The report suggests revisiting methodology at the end of the decade as capabilities and markets evolve. We respectfully recommend revisiting methodology in the 2025 plan if not sooner.
- On page 30, we support the call out to strategic electrification. Is there a way to delineate in the graphics of emissions how much of our electricity emissions are associated with high efficiency electric heat pumps and electric vehicles? The text notes elsewhere that the numbers of EVs are negligible but will not be in the future—perhaps this should be considered for future inventories.
- On page 32, the report indicates there have not been any appreciable changes to estimating emissions from the thermal sector. We respectfully recommend a near-term action to better understand the rate of methane leakage from both front-of-meter and behind-the-meter losses. Given methane’s more extreme GWP, the state inventory should not assume gas flowing through meters is successfully combusted.
- On page 32, the report mentions emissions from industrial processes. As this will likely be one of the hardest sectors to electrify and/or decarbonize, we suggest drafting a call-out box with more information on what end uses are included in this category and highlighting any initiatives to decarbonize this sector.
- On Page 33, in addition to requesting EPA modify their tools and methodology to account for biodiesel blending, could the state independently seek data from the delivered fuels industry that accounts for the percentage of biodiesel blends and number of gallons sold? Presumably, this is data that is already tracked given the mandates of the Biodiesel Heating Oil Act, updated in 2021.
- Please consider supplementing Table X on page 34 with the GWP of other GHGs and include any relevant differentiations in GWPs over time horizons of the Act on Climate mandates. For instance, the GWP of methane, when vented or leaked into the atmosphere, is 84 times that of Carbon Dioxide in its initial 20 years in the atmosphere which will hamper efforts to meet the 2030, 2040, and 2050 reductions requirements of the Act on Climate. This understanding will be critical for policymakers to develop priority actions to limit thermal sector emissions throughout the state and region.
- On page 54, the report draws a distinction between “expressly reducing vehicle miles traveled” and “strategies to improve the relative attractiveness of alternative forms of mobility.” It’s unclear what exactly the former entails that would not be included or accomplished by the latter. More clarity on what is meant would be helpful.

Thank you, once again, for the opportunity to provide comments on the latest Working Draft. We are encouraged by the progress and the robust discussions taking place during Council and Advisory Board meetings as well as the Sharing Sessions and Workshops. We recognize and appreciate the significant engagement efforts underpinning this process and look forward to continuing our work together.

Sincerely,

Hank Webster, *Acadia Center*

Kai Salem & Mal Skowron, *Green Energy Consumers Alliance*

Sue AnderBois, *The Nature Conservancy*

Meg Curran, *Conservation Law Foundation*

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