

December 2021

Answers and additional information provided by Joe Dammel, Gas Decarbonization Director at Fresh Energy via Margaret Cherne-Hendrick (EVAC).

Questions for both spaces

- Are communities most impacted by this policy here at the table? Are people at the table consulting with impacted communities?
 - The NGIA stakeholder meetings to discuss analytical frameworks are open to the public. Thus far, only one member of the public has attended one meeting. Gas utilities, Fresh Energy, Sierra Club, CEE, RMI, labor unions, the Department of Commerce, GPI (as facilitator), and technical experts/consultants have generally attended these meetings. These meetings have focused on analytical methods to assess the carbon intensity of a resource (such as renewable natural gas and the GREET model) and how to measure the cost-effectiveness of the resources (such as using the process outlined by the National Standards Practice Model for distributed energy resources). Jobs and impacted communities are likely to be qualitatively assessed in the discussion of costs and benefits of an NGIA resource, but the stakeholder meetings have focused on discussion of the technical details of the analytical frameworks.
- In what ways are low-income communities and communities of color currently being disproportionately impacted by our energy systems (eg. higher pollution burdens, higher energy cost burdens, paying for CIP programs but not being able to access them, poorer indoor health and safety, lower reliability performance metrics)? How do ECO/NGIA implementation need to account for and respond to these historic inequities?
- What will it take to address barriers to participation related to language, property ownership, citizenship status, and bank/credit access?
 - In NGIA Plans, it will be important for utilities' programs to be designed in a way that addresses these barriers and there will be an opportunity for public comment after those plans are filed in summer 2022.
- Who will financially benefit from the investments made? Who owns, profits from, and makes decisions about the infrastructure?
 - Investor-owned utilities own and can earn a return on assets that the Public Utilities Commission approves when it reviews a utility's rates in a rate case or other rate-affecting docket such as a rider docket.
- What workforce goals or Women or Minority Owned Enterprise goals will these investments achieve? How are they being intentional / going above and beyond to foster equity through career and entrepreneurship opportunities?
 - For NGIA, when utilities file NGIA Plans beginning in summer 2022, the public will have the opportunity to comment at the PUC to advocate for modifications to the proposed plans or to advocate that the Commission prioritize important, historically-marginalized groups and communities through the implementation of those plans. For the Future of Gas docket, the Commission is likely to hold a

public process to discuss these issues and hear from those affected by the fossil gas system. To date, however, no comment period, workshop series, or hearing has been set for the Future of Gas docket in 21-565.

ECO Act

- Are communities most impacted by this policy here at the table? Are people at the table consulting with impacted communities?
- How are we ensuring electric vehicles are made accessible to low income and BIPOC residents who often experience the brunt of pollution from vehicles?
- How can we target low income and BIPOC communities with aging furnaces for electrification and deep home retrofits?
- How do these strategies accelerate opportunities for lower costs, improved quality of life, asset ownership and wealth building, and job opportunities/ business development opportunities for low-income/BIPOC residents?

NGIA

These are all very important questions and concerns for the Commission to consider, especially in the Future of Gas docket, 21-565. Fresh Energy's goal is to center equity and consumer protection in the discussion of the gas transition and is hopeful that it can help facilitate participation of groups that have not traditionally been at the PUC. Increased access to data to better understand the gas system and the neighborhoods it impacts along with data about system investments is an important first practical step to meeting these goals. Under-resourced communities already face higher energy burdens and health impacts from the existing fossil gas system. Prioritizing these communities in the gas transition means tailoring program offerings to those communities and targeting investments in the communities to meet needs and close the disparities in important outcomes. This could mean targeting electric infrastructure upgrades in a neighborhood that has unreliable electricity and then electrifying homes with more efficient electric appliances and efficiency upgrades. Or designing rates such that customers who remain on the gas system do not bear the burden of customers who have left the gas system. One of the most important ways to ensure this happens is to focus on utility capital investments that utilities are making today, because these assets have a 40 to 50-year lifespan and utilities are spending more money on these investments each year. Finally, it is important to note that the PUC has not yet started this discussion, which will begin in the Future of Gas docket sometime in 2022, but carry on into the future in almost all gas-related dockets the PUC hears.

- How do we ensure low income and BIPOC households are not left behind in the transition to low carbon fuels and electrification?
- How do we ensure that any associated costs of gas decarbonization are not disproportionately felt amongst low income and BIPOC households
- How do gas replacement options differ in their impacts to low-income/BIPOC energy users? Which approaches will meaningfully improve indoor air quality, home comfort/safety/adequate climate control, affordability, neighborhood air pollution, etc., and which will leave these factors unchanged or move them in a negative direction?

What has happened to date around NGIA (e.g. topics/dates for stakeholder meetings re: Docket 21-566 and who has been attending)?

Of the two NGIA dockets, 21-565 or the “Future or Gas” and 21-566 NGIA frameworks, the frameworks docket has been the only active docket in 2021. This docket focuses on establishing analytical frameworks for cost-effectiveness and carbon intensity for Commission use in assessing resources in utilities’ NGIA plans when they are filed in summer 2022. The Commission endorsed a stakeholder-led process in November 2021, with Fresh Energy advocating for a Commission-led process. The stakeholder process has been convened by the Great Plains Institute and involves regular stakeholder meetings that are expected to last through January, when utilities will file proposals for public comment at the Commission. These stakeholder group meetings are open to the public and notes from the meetings are filed in docket 21-566 after each meeting. The Commission will take comments on frameworks proposals with an initial comment deadline of February 25 and a reply comment deadline of March 18.