

CLF Testimony to Senate Committee on Climate Change and the Environment

April 4, 2022

Thank you, Chair Creem, and members of the committee for inviting me to speak today. I'm Caitlin Peale Sloan, Vice President for Massachusetts at Conservation Law Foundation. Audrey just gave you the positive vision of the possibilities before us. I'm here to talk about the bad stuff: the threats posed by the gas utilities' preferred quote unquote net zero strategies.

- First, I don't want us to lose track of the term "net zero" in this context.
 - I'm happy to elaborate on this in response to questions, but it's really important that policymakers do not ask or allow individual companies or even industries to plan for Net Zero. They need to plan for full zero as the default, and the state needs to make the call on what can't feasibly be decarbonized.
 - *Every corporation out there is rushing to put out its "net zero business strategy" so they can claim to be doing something on climate.*
 - *But if you added all of those plans up, you would see a staggering and impossible amount of negative emissions required to cover all of the polluting that they plan to still be able to do under the guise of "net zero". Net Zero by 2050 for the Commonwealth is an ECONOMY-WIDE standard, and there is a very small amount of netting that is going to be technologically feasible.*
 - *It's likely that the resi & commercial thermal sector must fully decarbonize with no netting as part of economy-wide net zero. Heating buildings is low hanging fruit relative to some of the challenges before us.*
 - *So just like every other corporation or even sector, gas utilities don't get to each plan to achieve net zero.*
- Second, the gas companies' preferred plans involve a convenient amount of gas infrastructure still in use in 2050.
 - Many of the speakers before me have emphasized this. I would point particularly to Mike Walsh's remarks, talking about how even a friendly-sounding "hybrid" scenario is one of the worst ways to meet a need for targeted backup from an economic perspective.
 - we don't know the exact picture of thermal system writ large in the long term, but we do know that there's a stark binary facing us right now: are we going to start to ramp down gas utility infrastructure and invest the billions left to be spent under GSEP into sustainable solutions with low ongoing costs and operating costs, or are we going to plow ahead and put billions more into the gas system?

- The gas companies want us to stick with the gas system, and their case for being able to do that relies entirely on future supplies, cost effectiveness, and emissions impact of hydrogen and RNG.
- One other extremely important takeaway from the pathways examined in the future of gas docket—to keep plowing ahead with this maximal gas infrastructure, the gas companies are already planning for regulatory mechanisms that trap customers on the system—think hefty fees for anyone trying to leave the gas utility.
- I'm going to hand the mic next to Ben Butterworth to talk about the bill of goods that the utilities are trying to sell around hydrogen and biofuels.
 - To Sen. Barrett's question earlier—remember that another way to talk about green hydrogen is as “incredibly inefficient electricity storage”. If you can't electrify something, inefficient storage might be an attractive alternative. But compared with the efficiency levels of air and ground source heat pumps...
- Before I do that, I want to recommend concrete action that the legislature could take this session to help cut this fossil fuel industry's two step off at the pass.
 - If I were a legislator right now, I would be adding language to any bill that moves this session remove the gas companies' ability to obfuscate these conversations with misinformation about biofuels and green hydrogen.
 - I fully support the Attorney General's request for the legislature to require a GSEP working group before the DPU takes action in docket 20-80. But I fear that conversations in that working group will not be productive if the gas companies are still allowed to talk about biofuels and hydrogen as their solutions.
 - So to the AGO's request, I would add three pieces:
 - 1) a complete prohibition on the distribution/blending of biofuels or hydrogen by gas utilities, and
 - 2) language that would prevent any future clean heat standard program (which EEA is working on right now under the Clean Heat Commission) from allowing obligated entities (including gas utilities and delivered fuel dealers) from using liquid or gaseous or hydrogen of any kind for compliance.
 - This would
 - 1) reserve the localized, targeted use of the very small supply of liquid and gas biofuels with some potential climate benefit we have in MA for the sectors that actually need it, and
 - 2) would head off the fossil fuel industry's attempt to maintain its climate-destroying business model in MA via obfuscation of the climate impacts of commodity-scale biofuels.
 - I would be very happy to draft up that language for any interested legislator.

- With that, I will hand it over to Ben who will tell you about why large scale hydrogen and biogas cannot be climate solutions for MA... [hand to next speaker]