BEFORE THE
STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Inquiry Regarding the Potential
for the Effective Use of Renewably Sourced Gas, P.L. 2023, Chapter 222

Docket No. 2023-00302

December 8, 2023

COMMENTS OF THE NORTHEAST GAS ASSOCIATION

The Northeast Gas Association (NGA[1]) is appreciative of the opportunity to respond to the Request for information put forth by the Maine PUC regarding the potential for renewably sourced gas, and the topics set forth in P.L. 2023, Chapter 222.

NGA applauds the Maine legislature and the Maine PUC for their efforts to promote and examine the future of RNG and other energy sources that will allow the state to meet its climate goals while ensuring reliable, affordable energy.

NGA and our members are committed to being a part of Maine's green energy future, and we believe that RNG, as well as other emerging technologies and decarbonization strategies, can play a crucial role in that future. NGA has been actively working with our members, through our Infrastructure Optimization Committee, focused on enabling the introduction of green gaseous fuels into the gas networks. In December 2022, NGA, working with members and other national organizations, released the "Interconnect Guide for Emerging Fuels into Energy Delivery Networks" to assist with the introduction of emerging fuels, like RNG and Hydrogen, into the natural gas distribution network.

[1] NGA is a regional trade association that focuses on education and training, technology research and development, operations, planning, and increasing public awareness of natural gas in the Northeast U.S. NGA represents natural gas distribution companies, transmission companies, liquefied natural gas suppliers and associate member companies. Its operating member companies provide natural gas service to over 13 million customers in 9 states (CT, ME, MA, NH, NJ, NY, PA, RI, VT). Maine members include Bangor Natural Gas; Maine Natural Gas; Summit Natural Gas; and Unitil. NYSEARCH is a subsidiary of NGA's RD&D Division, NYSEARCH, and for more than 30 years has worked as a consortium of natural gas Local Distribution Companies (LDCs) who have a common interest and need for research and technology development and demonstration. NYSEARCH has spent over 30 years researching and designing projects to support LDCs as they seek to better understand opportunities associated with RNG.

RNG's Role in Ensuring Green, Reliable, and Affordable Energy.

RNG and other emerging technologies can play an important role in ensuring reliable, affordable energy for Maine's residents. RNG can provide benefits in terms of fuel security, economic revenues or savings, local air quality and greenhouse gas emission reductions[2]. Another major benefit, RNG utilizes existing, natural gas infrastructure.

The New England region faces natural gas supply constraints largely due to limited pipeline infrastructure. In the winter, these constraints create significant risk to the region, both in regard to the electric grid and to heating[3]. Without expanded pipeline capacity, the development and use of emerging fuels like RNG and blended hydrogen offer an opportunity to diversify and increase the energy supply for the State of Maine.

According to the 2022 Maine Energy Summary and Assessment[4] produced by the Maine Governor's Energy Office, in recent years, natural gas has increased as a fuel used for both electricity generation across New England, and for home heating in Maine, allowing Mainers to consume less of other more polluting fuel types, such as oil. As Maine considers avenues to enable greener home heating, energy sources like RNG can be supplied through the existing natural gas distribution network to provide more affordable and reliable energy compared to other energy sources.

Beyond home heating, RNG and hydrogen can play a significant role in decarbonizing transportation and hard-to-electrify industries. According to a report from the Coalition for Renewable Natural Gas and NGVAmerica[5], in 2022 RNG as a transportation fuel "lowered GHG emissions equivalent to 13,962,408,760 miles driven by the average passenger car." Further, RNG use as a transportation fuel grew 17% over 2021 volumes, increasing 218% over the last five years.

RNG can also play a crucial role in decarbonizing hard-to-electrify activities ranging from the maritime sector to industrial applications requiring high temperature or high energy density for which electrification is challenging, including aluminum, glass and ceramics manufacturing or steel production.[6]

[2] https://www.epa.gov/lmop/renewable-natural-gas
[3] FERC, Chairman Phillips Announces June 2023 New England Winter Gas-Electric Forum
[4] Governor's Energy Office, 2022 Maine Energy Summary and Assessment
[5] The Coalition for Renewable Natural Gas and NGVAmerica, Decarbonize Transportation with Renewable Natural Gas
[6] Guidehouse, The Coalition for Renewable Natural Gas, "Renewable Natural Gas Poised to Propel Green Transition in Maritime and Aviation Sectors."
[6] Guidehouse, The Coalition for Renewable Natural Gas, "USING RNG TO MEET VOLUNTARY GHG TARGETS"

Other Decarbonization Technologies and Practices

NGA believes that there is no one solution to meet the decarbonization goals. Electrification alone is not the answer, especially when you consider reliability and affordability. All options should be explored through demonstration projects in multiple regions in the State of Maine.

In addition to RNG, hydrogen and hydrogen enriched natural gas, NGA believes other technologies and practices are worthy of the commission's consideration. Hybrid heating, using high efficiency heating systems combined with air sourced heat pumps, reduces upfront and ongoing operating costs for homeowners and businesses while providing energy reliability and comfort.

Geothermal heating and cooling, using constant below ground temperatures, is another technology that NGA believes warrants evaluation for various applications in the State of Maine. Across the Northeast, our members are taking a *good science / common sense approach* to developing, evaluating, and deploying each of these technologies, and NGA will continue to work with our policymakers, regulators, stakeholders, and member companies to support these efforts.

Conclusion

NGA and our members stand ready to assist the Maine PUC as it evaluates the development of technologies and strategies that can help the state reach its climate goals while addressing reliability and affordability concerns for residents and businesses. NGA and our members are leaders in promoting the development and deployment of RNG. As stated above, we have been working to ensure that RNG can be efficiently integrated into our energy systems as demonstrated by the development and introduction of our *"Interconnect Guide for Emerging Fuels into Energy Delivery Networks - Introduction of RNG and HENG"*, which we have attached to these comments.

In conclusion, NGA supports Maine's efforts to explore the future of RNG and other energy sources in the state. We believe RNG, in balance with other emerging technologies and decarbonization strategies, can play an important role in helping Maine meet its climate goals while enhancing energy reliability and preserving affordability.

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NGA appreciates the opportunity to provide comments and encourages the Maine PUC to have further discussions with stakeholders on these emerging energy sources, technologies, and practices.

Respectively submitted,

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