

Public Hearing Statement
National Fuel Gas Distribution Corporation
Albany, April 14, 2022

My name is Randy Rucinski, and I am Deputy General Counsel & Chief Regulatory Counsel at National Fuel Gas Distribution Corporation.

National Fuel is a natural gas utility that has been in the state for more than a century and serves a market of more than 1.2 million residents and businesses in Western New York. We support New York's greenhouse gas reduction goals, and are committed to working with the state to achieve those goals in a responsible way that ensures safe, reliable and affordable energy delivery for our customers.

To successfully achieve the enormous energy transformation required by the CLCPA no one form of energy will be sufficient. Bans on natural gas service and appliances, closure of substantial portions of the natural gas system or near-complete, economy wide electrification are extraordinary measures that will impair energy reliability and increase costs for consumers.

The Scoping Plan should create a blueprint to optimize the natural gas system in concert with the electric system. Just as the electric system can be decarbonized with renewables like wind and solar, the natural gas system can be decarbonized using renewable natural gas (RNG) and hydrogen. Other states and countries have implemented policies and regulatory frameworks that encourage development of these decarbonization tools, and New York should do the same.

Especially for upstate and western New York, an all-electric model is too expensive and risks reliability and resiliency of the energy delivery systems. Adoption of a hybrid dual-energy pathway using storm-resistant, underground natural gas networks to deliver RNG and hydrogen can reduce emissions while minimizing the strain on the electric grid and the hundreds of billions of dollars that must be spent to expand it. Hybrid dual-energy heating systems will result in significant savings for homeowners compared to an all-electric solution, are more effective in colder climates than traditional electric heat pumps and can reduce emissions by more than 90% when combined with energy efficiency and decarbonization.

New York's climate goals can be reached with a balanced "all-of-the-above" approach that uses a mix of energy sources and doesn't impose unnecessary risks and burdens on the state's residents and businesses. We urge the Council to adopt a hybrid pathway that fully utilizes our existing gas and electric networks and recommend consideration of renewable gas standards similar to those adopted in other jurisdictions.

Thank you.