

**BEFORE THE NEW YORK STATE PUBLIC SERVICE COMMISSION**

Matter Master: 23-00902/23-G-0225

Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of The  
Brooklyn Union Gas Company d/b/a National Grid NY for Gas Service.

Matter Master: 23-00903/23-G-0226

Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of  
KeySpan Gas East Corporation d/b/a National Grid for Gas Service.

**ALL OUR ENERGY- STATEMENT OF OPPOSITION  
TO THE JOINT PROPOSAL**

May 1, 2024

All Our Energy stands opposed to this joint proposal.

**Significant serious issues raised by parties have been ignored, wholesale.** They were completely not addressed and were glossed over as the company and Department of Public Service seem to work together to avoid all accountability. We imagine they will show up in those parties' opposition to this proposal. We support almost all of them, especially all attempts to reign in the Greenpoint LNG project.

**Ballooning rate increases go completely unrestrained.** Maybe the most outrageous is the company had characterized this rate process to be a discussion on a \$28 a month[1] increase at the start, which was already over 5 times the last increase. It was also characterized as a 16% increase. Then, we found out in their live presentation at their hearings for the first time 5 months later, this amount was actually \$34. Here, DPS has somehow managed to agree to give them more than was first characterized to the public- and which will become nearly three times as much by 2026 at a total \$62 increase per month. This has also been characterized by the company about this higher increase included in the joint proposal as only a 9% increase [2] by the company which we cannot understand why they consider math to be a debatable issue up for opinion which they can game and spin.

**Unwise investments are not in the public interest.** To continue sinking ratepayer funds into what will be unusable, stranded, and very expensive assets is wrong. In light of current studies including by Building Decarbonization Coalition, fossil gas infrastructure will need to be replaced to the tune of a total of over \$60,000.00 per customer in the coming years[3]. Yet, here we are avoiding discussing viable alternatives, much less forcing them to be included. With that amount of money on the table, there are numerous other options. The companies know this, which is why they are desperate to ignore damning facts, and just sink ratepayer funds to start the down payment on that process. On average this amount is significantly more expensive than individual households switching to full geothermal energy, and somewhere about twice the cost of switching an average size home to air source heat pumps, NONE OF WHICH WILL EVER NEED DIRTY GAS

**Full Opacity, Distraction, Delay, and Hurry.** The way DPS and the companies purposely avoided public hearings on this issue time and again while gaming the calendar on parties, is absolutely against the public interest. We do not understand why no final public hearings are scheduled except for call-in comments recordings and written submissions, other than to seek to keep the process as opaque, confusing, and as distant from the public eye as

1] LI's National Grid customers could see 16.3% price hike if new proposal is approved, <https://longisland.news12.com/lis-national-grid-customers-could-see-163-price-hike-if-new-proposal-is-approved>

2] National Grid natural gas customers could see monthly hike under rate plan <https://www.newsday.com/long-island/national-grid-monthly-increases-three-year-rate-plan-b966fqqp>

3] The Future of Gas in New York State. <https://buildingdecarb.org/wp-content/uploads/BDC-The-Future-of-Gas-in-NYS.pdf>

possible. A denial of democracy, and in many cases science and provable facts, to achieve a predetermined outcome for the companies, with as little pushback and oversight as our state regulators could get away with, is not in the public interest.

**Ramp up costs right before this utility model must turn down.** We submit that it is ludicrous to continue to invest possibly the largest amounts of additional rate payer money, here in a rush to complete it prior to that plan, into a system that will have to be abandoned in 15 odd years. Who is going to pay for that? It should not be ratepayers, and it should not be citizens of the state of New York. It should be the people responsible for managing the transition off fossil fuels not only mismanaging but fighting the transition. We are trying to provide your company, likely to be found guilty in the future of purposeful harm to the climate, a lifeline to move into thermal energy networks mostly to save all of the good union workers' jobs. To wit, you have refused or are botching nearly every effort to grab the lifeline, instead pulling down and drowning New Yorkers with your refusal to change. The audacity to present this huge rate increase literally days before the company is going to be required to present their plan to ramp down gas in New York, which if their "Energy Vision" was any indication, seems the going plan is to ignore that. It also ignores mandated reductions required- maybe half of which have to happen during this rate period. If not achieved or we simply face purposeful delay tactics to compress the time in which change must happen, making it unnecessarily more difficult, we mark here that should be on the companies. Yet, no mandate to do anything of the like is included here. Terrible oversight by our state regulatory apparatus- a complete failure to regulate or achieve even modest accountability from our public utilities. It frequently seems that we find ourselves, DPS, and the public being regulated by them.

**Climate damaging, community disregarding.** Most importantly, for the climate and our communities, is that the proposal does not comply with CLCPA section 7.2- whether it would cause greenhouse gas reductions to remain unreached, it does; or section 7.3 that it does not disproportionately adversely affect disadvantaged environmental justice communities, which it makes no claim to avoid. The Department are mandated to not just testify they did consider environmental justice and now disadvantaged communities, BUT PROVE IT. Yet, they are not even attempting to preemptively comply with what they're mandated to do. Apparently, they can't because it has been no part of the discussion nor in this proposal, neither has community outreach nor engagement.

How did we get to such a shoddy proposal after almost a year, which gives companies everything they asked for and ignores numerous parties' rightful concerns? It's because Governor Hochul's Department of Public Service and the companies are not acting in the public interest.

This proposal is not in the public interest and should be rejected.