

Dear Secretary Phillips,

We are communicating to ask the Public Service Commission to deny the petition filed by the fossil fuel front-group, Coalition for Safe and Reliable Energy. The Coalition's petition leans heavily on a dubious claim that the state's renewable energy programs are causing system reliability concerns and/or jeopardizing safe and adequate service. In addition, the Coalition expresses interest in examining the relationship between Renewable Energy Program costs and customer arrears, suggesting the programs are contributing to an increase in customer arrears. Nowhere does the Coalition create a clear clausal link between the renewable energy programs and the triggers for suspending the obligations under the programs. Our understanding is that the statute permits the PSC to act only when the Renewable Energy Program is causing a present, demonstrated harm – such as actively impeding safe service or driving up customer disconnections. The claimed implementation delays and missed timelines do not qualify. The petition describes the lack of progress on renewable energy development as if it were the causal basis for the hearing in and of itself. That also does not meet the requirements for PSC action. We believe the statute also restricts the changes the PSC can make through a hearing. You can temporarily suspend or modify the utilities' obligations under the Clean Energy Standard but we believe it does not give you the power to change the CLCPA's 2030 or 2040 electric sector targets themselves.

This petition is backed by fossil fuel adjacent trade associations, real estate organizations and utility interests that have strong business reasons to resist electrification mandates and renewable energy expansion.

We support the renewable energy programs that are already working for communities like Rochester. We appreciate the law our Legislature passed to deliver cleaner air, lower long-term energy costs, and a stronger, more reliable grid, especially for frontline communities that have been burdened by fossil fuel pollution for too long. The CLCPA was written to change that via Section 7(3) which specifically says state agencies must not add new disproportionate burdens on disadvantaged communities and must prioritize cutting pollution in those neighborhoods. Pausing the clean energy programs through this petition will exacerbate the harm to disadvantaged communities.

We ask you to deny this petition.

Thank you for your attention to this,

John Keevert, for the Environmental Justice Ministry of First Unitarian Church