

Illinois Commerce Commission (ICC)
Future of Gas Workshops: Phase 1
Written Comment Template for Workshop #6 – May 20, 2024

Instructions:

- Using this Written Comment Template, send written comments to the Facilitator, Celia Johnson: Celia@CeliaJohnsonConsulting.com **by Monday, June 3**
 - Include “Workshop 6 Comments” in the subject line.
 - Please keep the description of each proposed topic brief (1-2 sentences). If needed, provide an explanation and rationale in the “Add Comments” section.
 - Please refrain from sharing a position on topics or issues – Phase 1 of the ICC Future of Gas Workshop process is focused on topic/issue gathering.
- Comments received will be posted [on the ICC Future of Gas website](#)
- Comments received may be used by ICC Staff and the Facilitation Team in preparing the Phase 1 Workshop Report

Comments Submitted By:

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Question 1: What topics should be further explored related to equity and environmental justice considerations?

Add Comments:

1. In addition to considering how to improve the distributional equity of the transition away from natural gas (including disadvantaged communities’ need for improved access to clean energy technologies and reduced environmental burdens), Phase 2 should consider additional avenues for ensuring procedural and substantive equity in the gas transition. In particular, inclusive decisionmaking should provide both meaningful participation and responsive outcomes.
2. Ideally, Phase 2 itself should incorporate direct participation from representatives of disadvantaged communities.

Question 2: What topics should be further explored related to electric utility considerations?

Add Comments:

1. Workshop #6 made it clear that electric utilities need guidance on how to reasonably forecast electrification impacts on their systems; by relying on fundamentally flawed assumptions, such as by converting delivered methane’s heat energy into an equivalent quantity of electric energy (which errs by incorrectly assuming that delivered electricity would need to have roughly the same heat content as the natural gas it displaces, when in fact modern electric heating equipment that *moves* heat can use a *small fraction* as

much energy as *generating* heat by burning fossil fuels), utilities have shown they need significant methodological guidance. Phase 2 of the workshop should include a focus on developing appropriate methodologies for this analysis, including reasonable technology assumptions and consideration of temporal (seasonal, daily, hourly, etc.) aspects of electric system load, including the extent to which new electric load may be somewhat flexible in response to electric grid conditions.

2. In Phase 2, the parties, Staff, and the facilitator should also explore who is the right entity to perform the analyses described in point 1 above – that is, whether it is optimally performed by electric utilities or non-utility parties such as a state entity, a consultant, or an academic center with relevant expertise. It is possible that different entities will be optimally situated to perform specific parts of the analysis.