



Representative Joseph Solomon Chair

House Corporations Committee

Rhode Island House of Representatives

June 16th, 2025

RE: Green Energy Consumers Alliance Opposes House Bill 6418

Dear Chair Solomon and members of the Committee,

On behalf of Green Energy Consumers Alliance and our thousands of members across Rhode Island, **I write in strong opposition to H6418** which would create a study commission to evaluate increasing the use and infrastructure for alternative fuels.

Consider the Practical Availability and Cost of Biofuels in the Commission

We want to underscore the importance of considering the availability and cost of biofuels when promoting their use as an alternative fuel. Evaluating the impact and use of alternative fuels for Rhode Island **has already been studied** in the Future of Gas docket ([Docket No. 22-01-NG](#)) at the RI Public Utilities Commission in which Energy + Environmental Economics (E3) wrote a technical report that found significant uncertainty associated with the cost, emissions reductions, and availability of alternative fuels for Rhode Island. Throughout the Future of Gas proceeding, the coalition group 'Beyond Gas' [provided comments](#) explaining why replacing fossil fuel in the gas system with "clean" fuel is not a viable option. Some of those comments are included below.

Biomethane (often referred to as 'Renewable Natural Gas' or 'RNG') is not a truly decarbonized gas and has a severely constrained cost-effective supply. The [technical report](#) prepared by E3 modeled decarbonization scenarios that comply with the Act on Climate. The report noted (p. 114) that there is significant uncertainty associated with the availability and cost of renewable fuels, and the emissions impact of fuels under different accounting mechanisms. 'Green hydrogen' has a wide flammability range and propensity to leak which makes it unsuitable for widespread distribution through pipelines and into homes and communities. You can read more about why RNG and Hydrogen are not the answer to home heating in [our blog](#).

Additionally, in 2023, the Massachusetts Department of Public Utilities (DPU) "reject[ed] the recommendation to change its current gas supply procurement policy to support the addition of renewable natural gas ('RNG') to LDC supply portfolios due to concerns regarding the costs and availability of RNG as well as its uncertain status as zero-emissions fuel" (MA DPU [Order 20-80](#), p.1). Rhode Island should adopt a similar stance to avoid costly and uncertain investments in RNG that directly undermine the state's clean energy mandates.

EC4's Climate Strategy Process

The Executive Climate Change Coordinating Council (EC4) is currently developing the 2025 Climate Action Strategy, which is being modeled by E3 and will consider how Rhode Island can meet the 2030 Act on Climate mandate. As part of the engagement process for that strategy, we

recommended a review of the working paper [*Biomass and Land Use in a Decarbonizing US Economy*](#) by the World Resources Institute. This paper evaluated the impact of relying on biomass as a pathway to a decarbonizing economy and provided policy suggestions that can be guardrails to prevent overreliance on biomass.

The report had four key findings:

1. Adequate guardrails and accurate carbon accounting are necessary to prevent biomass use from negatively impacting climate, ecosystems, and food systems.
2. If the United States pursues economy-wide action to meet 2050 targets, biomass is best utilized for carbon removal and replacing petrochemicals.
3. Crop-based biofuels are not an effective tool for achieving economy-wide decarbonization.
4. Dependence on biomass and, accordingly, land use pressure – can be reduced by accelerating electrification across economic sectors and increasing energy efficiency.

Though the findings are based on a US wide decarbonization, they can be adapted for use in Rhode Island, particularly findings 3 and 4.

The Climate Action Strategy should consider if any policy guardrails like the ones outlined in the WRI report are necessary to protect Rhode Island against overreliance on biomass. When expanding on the key findings, the report detailed that crop-based biofuels are not an effective tool for economy wide decarbonization due to the land carbon cost of biofuels. There was also data that suggests drop-in fuels are more expensive than renewable sources like wind and solar in the long term, and purpose-grown biomass crops use more land area than wind and solar.

A managed transition to electrification must be done at a pace that ensures Rhode Island will meet the requirements in the Act on Climate without overreliance on biomass or use of biomass in sectors where it is not warranted. Ambitious buildout of renewable energy resources is what will get Rhode Island to meet the 100% RES by 2033 and reach the mandates in the Act on Climate. As the report outlines, the value and role of biomass in decarbonizing Rhode Island's economy must be weighed against other land use pressures and against the cost to utilize biomass relative to renewable energy sources.

If the state feels like biomass and biofuels need further study, the appropriate avenue is through the EC4's Climate Action Strategy process. This is to ensure all impacts of reliance on alternative fuels are being modeled and compared to other strategies the state can employ to meet the mandates in the Act on Climate.

Consider the Cost of Alternative Fuels Compared to Wind and Solar

The bill language presumes that alternative fuels have the potential to lower fuel costs compared to fossil fuels. We caution against making that presumption without reference to the reports and studies mentioned above. Additionally, the Future of Gas technical report found that Rhode Island is likely to become a net importer of alternative fuels like biofuel, which can drive up the cost for gas

customers over the long term (pg. 35). This points to the lack of certainty around what impact alternative fuels could have in increasing state energy independence and what costs consumers would face if alternative fuels were to become more widespread.

Lack of Diverse Representation on the Commission

The proposed commission's membership would be heavily biased towards representation from the biofuels and nuclear industry, with no clear representation from environmental organizations or the public health industry. The makeup of the commission leads heavily towards considering the economic impacts of expanding the alternative fuels industry in Rhode Island without much consideration towards the environmental or health impacts of expanding this industry.

Public Health Considerations

Though the bill points to improved public health outcomes from alternative fuels as compared to biofuels, a report entitled [*Breathe Easy*](#) by Rewiring America points to the various health benefits from electrification due to the elimination of burning fuels from a home. While there may be incremental benefits from switching from fossil fuels to alternative fuels, high levels of electrification are the only pathways that ensure Rhode Island can meet climate mandates while improving public health and addressing affordability concerns.

Conclusion

We oppose the creation of this commission on the basis that alternative fuels and their use for Rhode Island has been evaluated in the technical report produced by E3 for the Future of Gas docket that came before the PUC.

However, if this commission is created, it should include a more diverse set of stakeholders that can speak to the environmental and public health impacts of alternative fuels as compared to renewable energy. The commission should also take into consideration reports that are already complete, or soon to be released, that already take into account the practical availability and application of alternative fuels for Rhode Island.

Sincerely,

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