

April 20, 2020

Hon. Michelle L. Phillips  
Acting Secretary to the Commission NYS Public Service Commission  
Empire State Plaza  
Agency Building 3  
Albany, New York 12223-1350

**RE: Case 19-G-0310 - KeySpan Gas East Corp. d/b/a National Grid**

Dear Secretary Phillips,

On behalf of North Brooklyn Neighbors (NBN), we are writing to comment on the current National Grid rate case.

NBN is a 26-year-old grassroots community organization serving the Greenpoint and Williamsburg sections of Brooklyn. Over the years we've fought to make a difference in the lives of residents by reclaiming the waterfront, advocating increased access to open space, combating pollution and legacy toxins, promoting community-centered land use, and empowering neighbors with important resources.

As an organization with deep community connections, we'd like to share concerns we have about the rate increase National Grid seeks.

- National Grid is included as one of the U.S. Environmental Protection Agency's Potentially Responsible Parties for the Newtown Creek Superfund site. For years, residents in our neighborhood and beyond have dealt with health and environmental risks posed by the contamination. Now, National Grid is asking those residents to pay more so that the company can finance the cleanup. It's immoral. Utility ratepayers must not be expected to cover the cost of environmental remediation when the utility company was the polluter.
- This practice allows companies who have been bad actors over time to then profit from degradation to the environment and harming the health of local residents. Instead, National Grid should be denied a rate hike and be forced to reduce the profits for themselves and their shareholders. This cost burden would also suggest that future practices to reduce contamination would be economically worthwhile for the company. While Newtown Creek is the most significant cleanup in our neighborhood related to National Grid, there are many sites in need of remediation due to National Grid's harmful practices. Former Manufactured Gas Plants can be found all over our region, some of which directly profited National Grid's predecessors.
- National Grid's commitment to sourcing renewable energy is severely lacking. In their filing, the company asserts that one reason for the rising costs is some focus on Renewable Natural Gas. However, for years it has been known that the Newtown Creek Wastewater Resource Recovery Facility partnered with National Grid to produce renewable energy from the city's organic waste. However, the program is years behind schedule and continues to be delayed. Additionally, much of that gas is meant to be sourced from NYC organics collection yet, because of COVID-19, the city has announced its intention to suspend organics collection. How can we be sure that National Grid will invest in building and improving infrastructure for renewable energy?

- Last year, the Climate Leadership and Community Protection Act (CLCPA) became law. One of its priorities is a dramatic shift to renewable energy sources. Does National Grid have a plan or strategy to comply with CLCPA for the infrastructure it seeks to build/update in this rate case? Before ratepayers are asked to bear the burden of increased costs, they need to be assured their monies will support projects that move us closer to energy efficiency and renewable energy. National Grid needs to present a detailed plan on how the proposed investments are aligned with the goals in CLCPA.
- As a local community organization working on environmental and community planning issues in North Brooklyn, our organization is uniquely positioned to reach the public. Yet we never received direct outreach about the proposed rate case. As a public utility, National Grid must do far more to engage the public in the decisions and plans for the company than they have done. Currently, there has been little opportunity for public input into their plans.
- Finally, given the magnitude of the crisis posed by the Covid-19 pandemic and its short-term or long-term economic impacts, a rate hike at this time is an additional burden. During this crisis, residents need economic relief.

In sum, we urge the PSC to reject the proposed rate increase. National Grid has failed to show how these new investments will move us closer to the state's climate goals and why ratepayers must shoulder greater costs during this recession.

Thank you again for considering our comments and we appreciate the opportunity to share our perspective.

Sincerely,



Anthony Buissereth  
Executive Director



Lael K. Goodman  
Environmental Justice Program Manager