Dear Environment Committee Chairs Cohen and Demicco, Vice-Chairs Gresko and Kushner, Ranking Members Harding and Miner, and Members,

Sierra Club Connecticut, on behalf of our 40,000 members and supporters in the state, appreciate the opportunity to submit testimony to the Environment Committee in favor of SB 232 An Act Concerning the Allowable Percentage of Leakage from Gas Pipelines. The allowable gas leak rate should be reduced from 3% to 1%; this will save our state millions of dollars and avert worsening climate damage from fossil fuel emissions that are escaping into the atmosphere.

Scope of Problem
In 2014, Public Act 14-152 was enacted allowing gas companies to leak up to 3% of all gas transported, and permitted companies to recoup the cost of “lost and unaccounted for gas” from ratepayers. Paying gas companies for the leaks was not an incentive to repair, and the practice costs ratepayers millions of dollars.

In addition to the impact on ratepayers, there is an environmental impact of 3% of the total of all gas transported leaking into the atmosphere. Three percent of all gas transported is a great deal of methane, a short term pollutant and greenhouse gas which is wreaking havoc on our climate. “Natural” gas is 97% methane combined with trace other gases and components that remain from the drilling process. Methane is the second most common greenhouse gas (GHG) in our atmosphere and by far the most damaging. Over 10 years, methane is 100 times more effective at trapping heat in the atmosphere than carbon dioxide, the most common GHG. The extraction, transport and use of methane result in a high number of leaks, both fugitive and intentional. Due to the cumulatively large amount of emissions over the lifecycle of methane, this fossil fuel is worse for the climate even than burning coal or oil. ¹²

Gas leaks are a barrier to achieving Connecticut’s GHG emission reduction mandates. Sec. 22a-200a of the Connecticut General Statutes requires that we reduce GHG emissions to at least 45 percent below the level emitted in 2001 by 2030, and to at least 80 percent below the level emitted in 2001 by 2050. The UN IPCC³ report and the Fourth National Climate Assessment⁴ released in 2018 highlighted the urgency of drastically reducing GHG emissions by 2030. In neighboring Massachusetts, a study by the

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¹ methane emissions and the greenhouse gas footprint of natural gas
² methane emissions and the greenhouse gas footprint of natural gas
³ https://www.ipcc.ch/
⁴ https://nca2018.globalchange.gov/
Conservation Law Foundation showed that the state is losing more gas from leaks than they are saving through energy efficiency programs.5

Policies to expand gas infrastructure were made based on the belief that “natural” gas could provide benefit compared to use of other fossil fuels. On the intrastate level, miles of new pipeline have been built to connect new customers to gas who were converted using ratepayer fees to provide discounts and advertising; there have been a total of three expansions on the interstate gas pipeline system (Kinder Morgan’s CT Expansion, Enbridge’s AIM and Atlantic Bridge) thereby increasing the amount of gas coming into the state. All these miles of new and expanded pipeline and the attendant infrastructure such as compressor, metering and regulation stations, mean more methane leaks. We now know that “natural” gas is worse for the climate, and we also now benefit from the advance of clean energy and renewable thermal technologies that have become viable replacements for fossil fuel burning generation and home heating.

Leakage rate much higher when measured objectively
In response to growing knowledge that methane leaks were underestimated, Sierra Club Connecticut undertook an objective study in 2016, using the best equipment to measure leaks in Hartford, then comparing that to PURA gas leaks data. Our proactive and objective study found a much higher rate of leaks than was reflected in the PURA data. We obtained the PURA data directly from the agency itself. The leaks from just the city of Hartford pipelines alone is enough to heat 214 homes for a year. 6&7

Objective and proactive measurement is superior to self-report
A system that doesn’t go out looking but learns about leaks retrospectively will not find all the leaks. It is not designed to. The majority of gas studies have found what our study found, that proactive leak surveys find a higher number of leaks than are noted in regulatory reports. In their 2018 testimony on a gas leaks bill before this committee, PURA discuss “leak surveys” but it is nowhere stated when these are done, if they are required to be done and at what intervals8

Payment for leaks may disincentivize repair
The provision in PA14-152 that creates a cost mechanism for ratepayers to pay for lost and unaccounted gas, disincentivizing repair. Last year PURA opposed reducing allowable leak rate because it could have significant ratepayer impacts. But the current law allows gas companies to bill customers for “lost and unaccounted for gas.” That

6 Hartford, CT Mobile Methane Leak Survey by Connecticut Chapter ... https://issuu.com/ctsierraclub/docs/hartford__ct_mobile_methane_leak_su
7 CT regulators ignore health and climate destroying methane leaks ... https://www.darientimes.com/.../ct-regulators-ignore-health-and-climate-destroying-m...
8 Methane emissions from natural gas infrastructure and use in ... - PNAS https://www.pnas.org/content/112/7/1941
payment should have been used to repair gas leaks. It is not clear why gas companies would need more money to fix leaks that they have charged to ratepayers for years.

Pipe replacement and leak repair are not mutually exclusive
PURA opposed this bill last year because it would “significantly impact the on-going bare steel and cast iron replacement programs that are in place…” but don’t state what those impacts would be. There is no reason why replacement programs can’t continue while objective monitoring and repairing of leaks on aged pipeline occur concurrently. It is a fact that while all companies are expected to replace old pipes, they have done so at variable rates. This variability shouldn’t be viewed as a good thing or the prerogative of industry, but evidence that industry generally must be required to do what is good for the health of the planet and the people.

PURA states in their 2018 testimony that gas companies must replace old pipeline in response to the recent DIMP regulations. Regulation to maintain the integrity of pipeline is necessary as pipeline owners haven’t always maintained vigilance, as a cursory glance at PHMSA data will reveal. But again PURA fails to explain how the responsibility of companies to maintain minimum standards on their privately owned equipment should be the burden of the ratepayers. In light of dangers to residents from pipeline explosions, arguing against concurrent pipeline replacement and repair is not in the interest of the public’s health, safety and future.

Sincerely,
Martha Klein
Sierra Club Connecticut