

NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES

Resolution 2025-02

NASUCA Resolution Encouraging Transparent Gas Utility Planning

Whereas the National Association of State Utility Consumer Advocates (NASUCA) recognizes the critical importance of transparent planning by natural gas utilities to ensure the affordability and reliability of gas service for consumers; and

Whereas gas utility planning processes often lack sufficient transparency into demand forecasts, cost assumptions, justifications for infrastructure expansion, and evaluation of alternatives to traditional natural gas, making it difficult for regulators, consumer advocates, and stakeholders to effectively assess the necessity, cost-effectiveness, and fairness of proposed infrastructure investments and supply decisions; and

Whereas a lack of transparency in gas utility planning can result in higher costs for consumers, increased risk of stranded assets, and disproportionate financial burdens on low-income and vulnerable communities; and

Whereas long-term integrated resource planning is an established framework for many electric utilities to evaluate supply and demand-side options, and a similar framework tailored for gas utilities could provide critical insights into future system needs and opportunities;

Now therefore be it resolved, that NASUCA urges state regulatory commissions to establish requirements for natural gas utilities to develop and submit comprehensive, transparent, and publicly accessible gas system plans; and

Be it further resolved that such plans should:

1. **Assess Future Demand:** Include detailed projections of gas demand under multiple scenarios. Evaluate demand forecasts for residential, commercial, and industrial sectors, highlighting key assumptions and data sources.
2. **Evaluate Supply Options:** Examine the availability, compatibility, reliability, and cost-effectiveness of various supply options.
3. **Incorporate Infrastructure Planning:** Identify and justify planned investments in new or existing pipelines, storage facilities, or other infrastructure and consider alternatives to new construction.
4. **Analyze Affordability and Equity Impacts:** Evaluate the potential cost impacts of proposed plans on different customer groups, particularly low-income and vulnerable households. Propose measures to mitigate any disproportionate impacts, such as targeted assistance programs or rate design reforms, and the cost implications of such programs on non-participating customers.

5. Include Decarbonization Strategies if Applicable: Outline how the utility plans to align with existing state and federal greenhouse gas reduction goals, such as through electrification or non-pipeline alternatives, including enhanced leak detection and pipe relining or repair. Assess the potential for integrating low-carbon fuels and energy efficiency programs into the utility's portfolio.

6. Ensure Stakeholder Engagement: Provide opportunities for meaningful stakeholder input throughout the planning process. Make all assumptions, methodologies, and data sources used in the planning process available to consumer advocates; and

Be it further resolved that NASUCA encourages state regulatory commissions to require regular updates to these plans, ensuring they remain responsive to changing market conditions, policy developments, and consumer needs; and

Be it further resolved that NASUCA supports the development of best practices and model guidelines for natural gas utility planning; and

Be it further resolved that NASUCA urges utilities to work collaboratively with consumer advocates and other stakeholders to enhance transparency and ensure fairness to consumers; and

Be it further resolved, that NASUCA authorizes its Executive Committee to develop specific positions and take appropriate actions, consistent with the terms of this resolution and the needs of its Members and their utility consumers. The Executive Committee shall notify the membership of any action pursuant to this resolution.

Submitted by the NASUCA Natural Gas Committee

Approved by the Membership

June 8, 2025

Columbus, Ohio

Abstained

Pennsylvania Office of Small Business Advocate

Tennessee Office of the Attorney General

South Carolina Office of Regulatory Staff