

Thank you, Commissioners, for this opportunity to speak. My name is Dr. Steven Greenspan, I am member of POWER's Climate Justice and Jobs team, and I am grateful to Office of Sustainability for its work in developing the draft materials.

As a retired vice president of research and strategy at a Fortune 500 IT company and as a user experience professional, I wish to focus my remarks on two areas that are not well-examined in the draft: innovative business models such as heat-as-a-service and the focus of a possible pilot.

The traditional business model for most gas utilities involves selling more and more gas to generate revenue. The devastating consequences of this model for our climate, our health, and environmental justice is well-documented.

In contrast, the goal of a Heat-As-A-Service business model is to maintain well-heated homes. With heat as a service, weatherization and ground-source heat pumps are in the company's bottom line interests because they reduce the need for additional energy. Please see my written comments for further details.

Regarding the pilot, we will learn little from piloting RNG, simple electrification or hybrid scenarios. Pilots should encourage innovation. I ask the commission to use this opportunity to examine the feasibility of geo-thermal micro-districts, and concurrently, heat-as-a-service, or similar business models. It is also vital that the pilot's design and analysis be subject to transparency, community participation, and 3<sup>rd</sup> party verification.

In closing, I ask the commissioners to encourage climate justice and innovation, and to prohibit PGW from any efforts to weaken the city's electrification and environmental justice efforts. Rate-payer revenue should never be used to undermine rate-payer values.

Thank you for your time and attention. I hope that these comments will be considered in the final report.