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To: [Secretary, BPUBoard \[BPU\]](#)
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The success of New Jersey's clean energy transition requires NJBPU's skillful avoidance of underutilized gas infrastructure in the coming years, especially for those ratepayers who can least afford to transition away from gas on their own [comments from Empower NJ]. Recently discovered massive methane leaks from gas pipelines show that our current gas infrastructure threatens climate goals [1].

Further, even "renewable" or "responsibly sourced" gas is plagued by faulty monitoring and conflicts of interest [2].

In addition to leaks, heat waves increase pressure inside pipelines, leading operators to vent gases that include carcinogenic VOCs and the powerful GHG methane [3].

Extreme weather events such as heatwaves are predicted to increase with climate change [4]. Most operators have no financial incentive to minimize emissions because they are allowed by federal law to charge consumers for gas that is "lost and unaccounted for" due to leaks, accidents, damage or maintenance [5].

Some of the intentional venting was disclosed by operators only after the press reported on the satellite evidence [5].

Absent a detailed plan to meet the state climate goals, NJBPU should not approve new fossil fuel infrastructure.

Thank you for the opportunity to comment,
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References

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5. West Texas gas operators released tons of excess emissions during June heat wave
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